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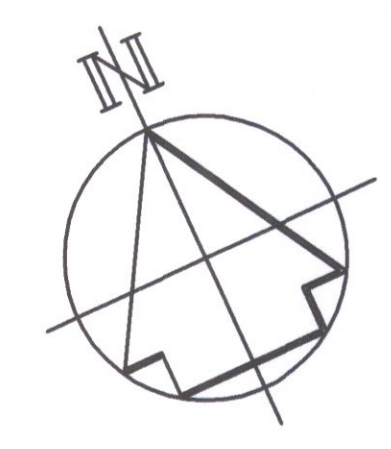
Requested Information-Map-4

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Environmental Protection Agency
 Waste Licensing
 Received 18 JUL 2005
 Initials _____

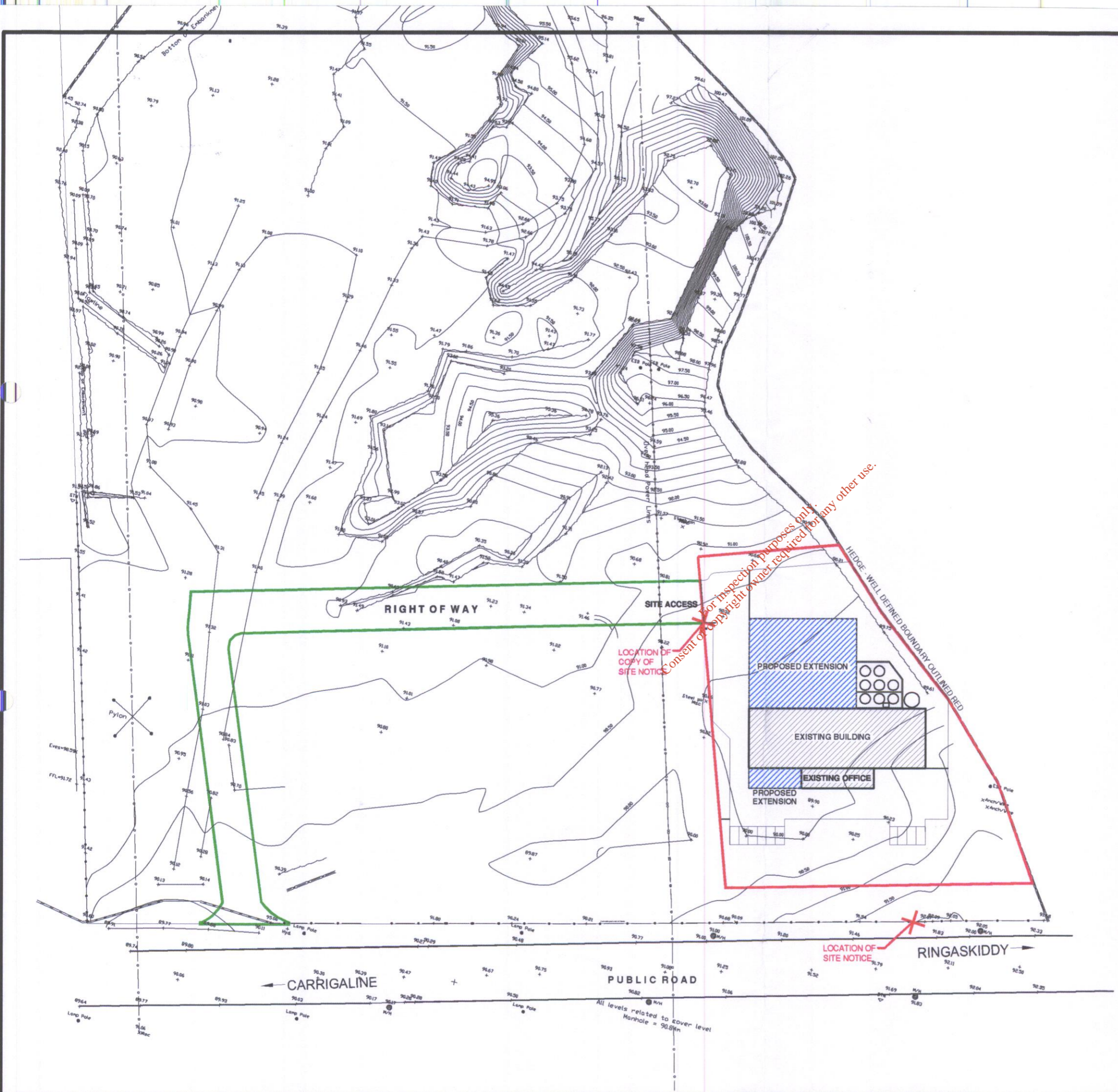
no.	revision	date

Kavanagh Ryan & Associates
 Unit 48, The Egan Centre,
 Dargle Road, Bray, Co. Wicklow.
 Tel. 2765661/662. Fax. 2765663.
 E-mail. kmryan@eircom.net



PROJECT Extension to Existing Building at Glendana Trading Ltd., Raffeen Ind. Park, Monkstown, Co. Cork.	SCALE 1:200. DATE Dec. '04. DRAWN A.C. JOB NO. C04109.
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TITLE Site Layout Plan.	DRAWING NO. Glen-2.
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Kavanagh Ryan & Associates. DESIGN AND CONSTRUCTION
 Unit 48, The Egan Centre,
 Dargle Road, Bray, Tel. 2765661/662. Fax. 2765663.
 Co. Wicklow. E-mail. kmryan@eircom.net

Client Extension to Existing Building at Gienedan Trading Ltd., Raffeen Ind. Park, Monkstown, Co. Cork.	Scale 1:1000. Date Dec. '04. Drawn A.C. Job no. C04109.
Title Block Plan.	Drawing no. Glen-1.



CONSULTANTS IN ENGINEERING & ENVIRONMENTAL SCIENCES

Our Ref.: Q2004/238/01/Ltr011/FM

Licensing Unit
Office of Licensing and Guidance
Environmental Protection Agency
Headquarters
P.O. Box 3000
Johnstown Castle Estate
Co. Wexford

15 July 2005

RE: Response to Article 12 compliance requirements for review of
Waste Licence Registration No. 145-2

Dear Sirs

Fehily Timoney & Company has been retained by Atlas Environmental Ireland Ltd to prepare a waste licence review for the above referenced licence in response to a letter issued by the EPA on 14th January, 2005.

With regard to the above document, please find herein, the following:

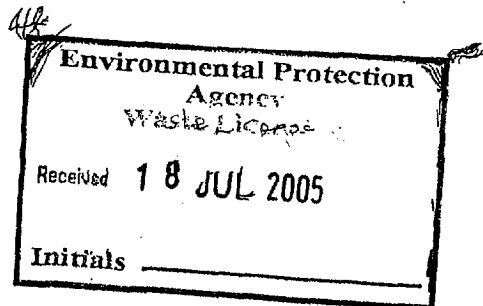
- One original, three hard copies and one digital copy of the Article 12 Compliance Requirements
- One original, three hard copies and one digital copy of the revised non-technical summary.
- One original and two copies of the transfer of a licence application form and supporting attachments
- A cheque for €5,000 for the processing of the application.

Please note that copies of drawings (drafted by Kavanagh Ryan & Associates) submitted with the planning application are enclosed.

Please contact the undersigned if you have further queries.

Yours faithfully

Jerome O'Sullivan
Jerome O'Sullivan
for and on behalf of Fehily Timoney & Company



Encl.

CORE HOUSE POULADUFF ROAD CORK IRELAND
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Directors: E. Timoney BE CEng FIEI MICE MCIWEM RConsEI D. O'Sullivan BE CEng MIEI RConsEI G. O'Sullivan BE CEng FIEI RConsEI W. Quirke Dip Ag
Company Secretary: A. Keohane Associates: D. Egan BSc MSc O. Tierney BE CEng MIEI RConsEI C. Mahony BE CEng MEng Sc MIEI

Registered in Dublin, Ireland, Fehily Timoney & Co. Ltd. Number 180497 Registered Office: Core House, Pouladuff Road, Cork. VAT Registration Number: IE 6580497 D



**WASTE LICENCE REVIEW APPLICATION
FOR A
HAZARDOUS WASTE TRANSFER STATION
AT
RAFFEEN INDUSTRIAL ESTATE
RAFFEEN
MONKSTOWN
CO. CORK**

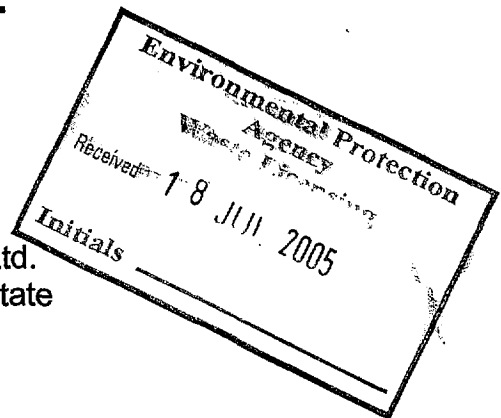
**WASTE LICENCE REGISTER No. 145-1
REVISED NON-TECHNICAL SUMMARY**

ORIGINAL

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Prepared for:

Gleneden Trading Ltd.
Raffeen Industrial Estate
Raffeen
Monkstown
Co. Cork



Prepared by:

Fehily Timoney & Company
Core House
Pouladuff Road
Cork


July 2005



**WASTE LICENCE REVIEW APPLICATION
FOR A
HAZARDOUS WASTE TRANSFER STATION
AT
RAFFEEN INDUSTRIAL ESTATE
RAFFEEN
MONKSTOWN
CO. CORK**

**WASTE LICENCE REGISTER NO. 145-1
NON-TECHNICAL SUMMARY**

User is Responsible for Checking The Revision Status Of This Document

Rev. Nr.	Description of Changes	Prepared by:	Checked by:	Approved by:	Date:
0	Amendments	JOS	DOS		14/07/05

Client: Atlas Environmental Ireland

Keywords: Non-technical summary, waste licence review, waste oils, bunded areas

Abstract: Gleneden Trading Ltd. wishes to apply for a review of the waste licence. The applicant wishes to use the existing site to store and bulk-up waste oils and other related wastes on site. The new facility will be fully managed by Atlas Environmental Ltd. No treatment of waste will be carried out on site. All waste will be sent off site for treatment and/or disposal. All operations will take place indoors. All wastes will be stored on site in sealed drums, tankers and other containers. Emissions will be minor. These proposed activities will have no impact on the environment.

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1. INTRODUCTION

This revised non-technical summary has been prepared in accordance with Article 12(1) (u) of the Waste Management (Licensing) Regulations, 2004. Sub-Articles (a) to (t) of Article 12 (1) are addressed below.

Gleneden Trading Ltd. (Gleneden) is the holder of Waste Licence Registration 145-1 which permits the facility at Unit 9, Raffeen Industrial Estate, Raffeen, Monkstown, Co. Cork to collect, store and treat (using a non-burn method) hazardous healthcare waste. In November 2004, Gleneden applied to broaden the scope of its licensed activities at the above mentioned site to include the acceptance, temporary storage and onward shipment off-site of waste oils and other hydrocarbon containing materials. Gleneden proposed to partner with Atlas Environmental Ireland (Atlas) who specialise in dealing in waste oil type materials.

Gleneden intends to suspend the processing of hazardous clinical waste for the time being and concentrate, in partnership with Atlas Ireland, on the bulking-up and temporary storage of waste oils. All plant equipment connected with the treatment of clinical waste will be decommissioned, dismantled and placed in off-site storage. However, Gleneden wishes to retain permission to treat clinical waste on site should the market again become more favourable in the future.

In January 2005, the EPA wrote to Gleneden/Atlas requesting some further information and clarifications in relation to the application. For administrative reasons, Gleneden/Atlas was not in a position to respond to the request until now. Apart from requesting detailed responses on a number of issues, a revised non-technical summary of the application was requested. This document comprises the revised non-technical summary in response to the EPA request. For assistance to the reader, the full text of the request for further information is appended.

2. COMPLIANCE WITH ARTICLE 12(1) OF THE ACT

Article 12 (1) of the Waste Management Act requires an applicant to describe himself and his/her proposals.

Article 12(1) (a) Applicant & Operator Details

Gleneden is the holder of the current waste licence (Reg. No. 145-1) for the Raffeen Facility. Gleneden is also the applicant in this submission. The contacts details for Gleneden Trading Ltd are:

Unit 9
Raffeen Industrial Estate
Raffeen
Monkstown
Co. Cork

Tel: (021) 4852477
Fax: (021) 4852490

Gleneden has entered into a partnership agreement with Atlas. Should Gleneden be granted permission to establish a waste transfer station at the Raffeen site the facility will be fully managed and operated by Atlas. The contact details for Atlas Environmental Ireland are:

Clonminam Industrial Estate
Portlaoise
Co. Laois

Tel: (0502) 74747
Fax: (0502) 74757

Under separate cover, an application will shortly be made to transfer the licence 145-1 from Gleneden to Atlas.

Article 12(1) (b) Relevant Planning Authority

Cork County Council
The Planning Department
Model Business Park
Model Farm Road
Bishopstown
Cork.

Article 12(1) (c) Relevant Sanitary Authority

There will be no discharge of any trade effluent to a sewer of a sanitary authority and therefore this sub-section is not applicable in this case.

Article 12(1) (d) Location Details of the Facility

The location/postal address of the facility is as above.

Article 12(1) (e) Nature of the Facility

Gleneden proposes to operate the facility as a waste transfer station. The new proposed activities at the facility will entail accepting, holding and bulking up hazardous and non-hazardous wastes and the onward shipment of the waste to licensed recycling/ recovery or disposal facilities.

The principal elements of the development will comprise:

- A main warehousing unit to be used for the receiving and storage of waste materials, including hazardous waste.
- A spillage retention area
- A tanker parking/inspection area
- Welfare facilities and ancillary offices
- Dispatch assembly area
- Car parking

The activities proposed on the site do not themselves lead to the production of wastes.

The only waste that would possibly be treated on site would be healthcare waste for which licensee currently holds a waste licence to treat. The current licence is for the treatment of healthcare waste using a heat disinfection unit (HDU) and the review application was for the continued use of the HDU (albeit after a temporary decommission period). The applicant now proposes to use a heat sterilisation unit operating on a slightly different principle (steam as against hot-oil). There is no significant difference between the environmental impacts of either unit however the latter treats the waste to higher standard.

The normal operating hours of the facility will be 7:00am to 9:00pm Monday to Saturday. Special deliveries e.g. from ships or as a result of an emergency call-out, will occur outside those hours.

Article 12(1) (f) Classes of Activity

The activities proposed for the site will comprise both waste disposal and waste recovery. The waste disposal activities proposed are the same as currently permitted with the addition of Class 11.

Class 7 Physio-chemical 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 5 or paragraphs 8 to 10 of this Schedule (including evaporation, drying and calcination)

Class 11 Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule.

Class 12 Repackaging prior to submission prior to any activity referred to in the preceding paragraph of this Schedule.

Class 13 Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned was produced.

The new waste recovery activities proposed is described under the following classification:

Class 13 Storage of waste intended for submission to any activity referred to in the preceding paragraphs of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced.

The principal activity at the site will be Class 13 of the Fourth Schedule.

Section 12(1) (g) Quantity and Nature of Wastes

In total the site is currently licensed to **accept and treat 1,600 tonnes of clinical waste per year.**

It is now proposed to accept and bulk-up an extra 5,400 tonnes of waste (mainly oils and automotive related waste) per annum.

Section 12(1) (h) Raw and Ancillary Materials

The only raw materials to be used are drums, pallets etc. used to safely pack waste before dispatching the waste off-site for recovery or disposal. Electricity, water, gas and fuel consumption will be minor.

Section 12(1) (i) Plant, Methods, Processes, Abatement and Operating Procedures

Plant

The existing plant equipment will be replaced with a new steam-based heat sterilisation unit.

The plant required for conducting **proposed operations** (i.e. handling, storage and off-site dispatch of waste oil materials) at the facility will consist of a pump, storage tanks, forklifts and a pressure washer.

Methods, Processes and Operating Procedures

Only properly labelled and authorised waste will be received at the facility. Waste will be accepted at the plant from fully licensed and registered carriers only. All authorised transport personnel will be fully trained in regulated waste oil management safety.

Deliveries of incoming waste will be scheduled to facilitate prompt unloading and storage of material. Once a consignment arrives at the facility it will be directed to the waste inspection area. All documentation will be checked. All tankers or containers will be visually checked for leaks. Rejected loads will be returned to the site of origin or quarantined on-site. Once accepted, loads will be directed to the appropriate storage bay area or storage tank.

Every drum, box and container etc. is given an individual barcode, which is clearly attached to two sides of the container. An "Incoming Waste Form" is then completed which records the drum number, the waste type, the drum type, the storage area, the UN number, the condition of the drums and if necessary the weight. If re-drumming is required this will be noted and recorded in the waste variation form.

Once quantities of various wastes have been accumulated to a manageable quantity they will be shipped off-site either in road tankers or in pallets.

Section 12(1) (j) This section is in accordance with information sought by the Agency of the activities purposed by the licence review applicant in relation to the matters specified in paragraph (a) to (g) of Section 40(4) of the Act.

Section 40 (4) of the Waste Management Act, 1996 deals with pollution:

(A) The potential emissions from the site include:

1. **Noise emissions** that may arise from operational plant and traffic to and from the site.
2. Waste handling, re-packing and bulking-up may give rise to some **dust emissions**. However, all such operations will take place under the enclosed conditions of the main waste transfer building.
3. The waste received at the facility will not give rise to significant **odours** due to:
 - The quick turnaround times for waste entering and leaving facilities
 - The storage of compacted waste in sealed containers
 - No food or putrescible waste will be accepted on-site

Apart from waste oils, most containers will not be opened on site, only stored prior to transportation off site to approved recycling or disposal outlets.

4. There is no discharge of any effluent to **surface water**. Surface water run-off from external yard will be discharged to a percolation area. Surface/storm water emissions will arise during periods of precipitation only.
5. There is no **sewer discharge**. The toilet/domestic type sewage is treated on site.

(B) Potential environmental impact of the site's activities on the various environmental media

1. Air

The proposed activities will have no significant impact on the quality of air because:

- All proposed activities will take place in-doors
- As all waste will be covered in drums, tanks or other tankers
- No dust causing activities will take place
- All external areas of the site will be hardstanding with the exception of landscaped areas
- Emissions arising from the heat sterilisation unit are to be recycled back into and absorbed by the waste itself. This represents an improvement on the current licensed activity

Odorous smells will not impact the air quality in the locality as any odours generated as a result of bulking activities will be controlled by the use of covered tankers and tanks. There will be no food or putrescible waste managed on site.

2. Noise & Vibration Impacts

All loading/unloading of waste and bulking up of waste will take place within the building. There will be no significant impact on the local environment.

Potential vibrational impacts may arise from the trucks moving to and from the facility. However, as the site is located adjacent to the N28 it presently experiences periodic high levels of vibrations from heavy vehicular traffic. Furthermore, the proposed facility will add 2 to 4 more traffic movements daily in the Raffeen area compared with the current facility. Therefore, the impact on the local environment will be minimal.

3. Discharges to Surface Water

There will be no discharges to surface water apart from rainfall.

4. Discharges to Sewer

There will be no discharges to sewer

The proposed activities will also have no impact on **climate, cultural heritage, ecology, human beings, hydrogeology or landscape.**

(C) The use of 'Best Available Technology (BAT) used to prevent/eliminate or reduce/limit/abate emission from activities carried out on site

The most important technology used on site will be bunding. This means that, if a tank is ruptured, its contents will be held in a sealed secondary tank.

(D) Applicant to demonstrate that he/she is a 'fit and proper person'.

The applicant, being Gleneden Trading Ltd, is a fit and proper person to hold a waste licence and does not possess any convictions under the Waste Management Act 1996 to 2003.

Atlas Environmental Ireland will manage and control the running of the waste transfer station. Neither Atlas Environmental Ireland nor any of its management staff possess any convictions under the Waste Management Act 1996 to 2003.

The site manager and all other site personnel will be fully trained Atlas Environmental employees.

(E) Applicant to demonstrate compliance with any requirements under Section 53 of the Act

Section 53 of the Act is concerned with the financial provisions of the operator. Atlas Environmental Ireland is a subsidiary of DCC Environmental. DCC has pledged to financially support the proposed activity particularly cost of decommissioning and clean-up.

(F) Applicant to demonstrate that energy will be used efficiently in the carrying out of the proposed activities.

As stated above already, the proposal is a low energy user.

- (G) **Applicant to demonstrate that any noise from the activity concerned will comply with, or will not result in the contravention of, any regulations under Section 106 of the Act of 1992.**

Section 106 of the Act deals with noise levels and emissions. This proposal includes a number of small pumps in addition to the replacement of some plant with similar type plant existing

Section 12(1)(k) Emissions Arising

1. Noise emissions may arise from operational plant and traffic to and from the site.
2. Waste handling, re-packing and bulking-up may give rise to some dust emissions. However, all such operations will take place under the enclosed conditions of the main waste transfer building.
3. The waste received at the facility will not give rise to significant odours due to:
 - The quick turnaround times for waste entering and leaving facilities
 - The storage of compacted waste in sealed containers
 - No food or putrescible waste will be accepted on-site

Apart from waste oils, most containers will not be opened on site, only stored prior to transportation off site to approved recycling or disposal outlets.

4. There is no discharge of any effluent to surface water. Surface water run-off from external yard will be discharged to a percolation area. Surface/storm water emissions will arise during periods of precipitation only.
5. There is no **sewer discharge**. The toilet/domestic type sewage is treated on site.

Section 12(1) (l) Effects of Emissions on the Environment

Emissions from the proposed activities will be so minor they will have no effects on the environment.

All waste movements onto and off the site will be in enclosed vehicles. All waste handling, re-packaging, bulking and storage will be carried out within the confines of the existing building. Odours will be controlled by storing the waste in sealed drums, tanks and other containers.

Section 12(1) (m) Monitoring of Emissions

Noise, dust and any other parameter specified by the Agency will be monitored as required.

Section 12(1) (n) Prevention, Minimisation & Recovery of Waste Arisings

As this is a transfer station virtually no waste will arise. Office and canteen waste will be handled in accordance with best modern practices.

Section 12(1) (o) Off-site treatment or disposal of waste

All bulked-up waste will be consigned to other Atlas facilities or other licenced sites.

Section 12(1) (p) Unauthorised or unexpected emissions

Due to the nature of the facility, the risk of unauthorised or unexpected emissions is predominantly from accidental leakages or spillage. In the unlikely event of such an emission, the supervisor will ensure that;

- The spill or leak is contained and cleaned up immediately
- The incident is recorded
- The EPA is notified immediately and samples are taken and sent for external analysis.

Section 12(1) (q) Closure and Restoration

Detailed arrangements for decommissioning of the proposed waste transfer station will be agreed with the Agency prior to instigation.

All waste remaining at the facility will be removed off-site to the appropriate recovery/recycling/disposal facilities.

Upon closure of the facility, all plant will be decommissioned and removed from the site to an appropriate reuse/recovery/disposal facility. All records will be stored at an appropriate facility.

Once the site has been decommissioned, there will be no emissions of any kind to soil, air or water. Effectively, an empty warehouse, parking bay, stores and ancillary offices will remain.

A comprehensive closure and restoration plan for the site will be drawn up in due course and will include details of post-closure monitoring.

Section 12(1) (r) Landfilling of waste

There is no landfilling of waste associated with this proposal.

Section 12(1) (s) European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2000 (S.I. No. 476 of 2000)

The quantities of waste to be stored on site at any one time are too small for this legislation to apply. The Health & Safety Authority were consulted with in regard to this issue.

Section 12(1) (t) Aquifer pollution with emission containing List I and II substances specified in the Annex to Council Directive 80/68/EEC

There will be no discharge to groundwater or aquifers. All tanks and drums will be banded. All of the site is hardstanding therefore there will be no pollution of underlying aquifers.

Non-Waste Activities

For commercial reasons, the applicant proposes to use part of the site for non-waste activities comprising primarily the storage and blending of water-treatment materials. Because the building proposed for those activities is within the 'red line' boundary of the licence, the activities will now be subject to the conditions of the waste licence. The non-waste activities will not give rise to any significant environmental emissions.

Appendix

Copy of EPA Letter (14th January, 2005)

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2. Provide details of the plant required to provide a paper and cardboard shredding and baling facility on site and provide information on their location within the facility.

3. Provide details of the proposed location of the existing plant as listed in attachment D.1 (d) and how this will be accommodated within the confines of the capacity of the facility as indicated in Drawing No. 2004-238-01-001.

4. Provide detailed specifications for all waste bulking mixing, blending, storage and spill retention tanks on site including volumes, venting systems and bunding arrangements.

5. Provide details of the infrastructure, storage location and capacity, which will be provided for the acceptance of contaminated soils, sludges and construction and demolition wastes at the facility ensuring that all proposed waste types indicated in table H.1.2 is accounted for.

H. Materials Handling

1. Provide details on the 400tpa of commercial waste indicated in table H.1(c)

2. Resubmit table H.1.2, EWC codes must accurately reflect associated waste description. All waste types specified must be included in the relevant section of table H.1(c) when appropriate.

3. The description and typical treatment given in table H.3.2 must correspond to all waste listed in tables H.1(c) and H.1.2.

3. Clarify storage capacity and location for all waste types listed in Attachment D.1(g) against the resubmitted table H.1.2. Assess storage proposed against the BREF *Reference Document on Best Available Techniques on Emissions from Storage* and the EPA *Guidance Note on Storage and Transfer of Materials for Scheduled Activities*.

4. Supply information on waste acceptance techniques to show they comply with EPA *BAT Guidance note for Waste Transfer Activities* for all waste types accepted on site. This information should deal with waste compatibility and confirmatory testing particularly regarding the proposal to bulk up and mix waste solvents and oil. The facilities ability to store waste in terms of both volume and type during the testing/compliance process should be addressed in the response.

5. Provide details on the proposed transfer and handling of solids with reference to the BREF *Reference Document on Best Available Techniques on Emissions from Storage* and the EPA *Guidance Note on Storage and Transfer of Materials for Scheduled Activities*.

6. Provide details of methods and control proposals for dealing with the proposal to accept packaging contaminated by dangerous substances.

7. Supply information on whether the facility intends to wash tankers and drums following waste delivery and submit proposals for dealing with this wash water.

E. Emissions

1. Complete table E.1 (iv) detailing fugitive emissions to atmosphere on site in particular from both the bulking and mixing of waste oil and waste solvent.

2. Emissions from the storage of contaminated soils must be addressed in particular dust and leachate.

F. Control and Monitoring

1. Supply information on the air filtration system proposed for the control of fugitive emissions of waste vapours from transfer activities.

2. Supply information on proposals for the control and subsequent treatment of emissions from the bulking, blending and mixing of hazardous waste solvent, packaging contaminated with dangerous substances and contaminated soils. Submit proposals on any ventilation systems proposed and any subsequent treatment of exhaust air.

J. Accident Prevention and Emergency Response

1. Assess the adequacy of the fire fighting equipment on site taking account of the volumes and types of waste stored. Carry out a risk assessment to determine if the activity should have a dedicated firewater retention facility. Regard in drafting your response should be taken to both the Agency's *Draft Guidance Note to Industry on the Requirements for Firewater Retention Facilities* and the BREF *Reference Document on Best Available Techniques on Emissions from Storage* and the EPA *Guidance Note on Storage and Transfer of Materials for Scheduled Activities*.

Your reply to this notice should include a revised non-technical summary, 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.

Please supply the information in the form of a one original plus three copies within one month of the date of this notice. In addition submit one CD-ROM copies of the requested information to the Agency. The e-file should be saved as a 'pdf' file, read only status.

Prior to the submission of the response to this letter please contact Ms. Niamh O' Donoghue at the above number.

Please note that the application's register number is 145-2. 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* quoting the register number.

Yours sincerely,


Ms. Marie O' Connor
Senior Inspector
Office of Licensing & Guidance

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