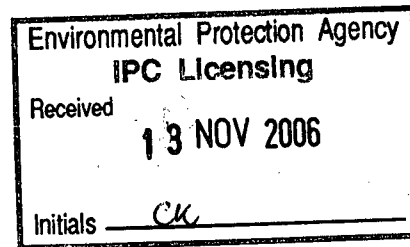


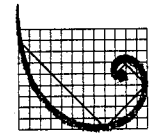
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Environmental Protection Agency
Headquarters
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Attention: Sonja Smith,
Programme Officer,
Office of Licensing & Guidance



ERM

10 November 2006

RE: Objection to specified conditions within the proposed determination for Licence W02332-01 by the applicant TechRec Ireland Ltd.

Dear Sir/Madam,

Following receipt of the proposed determination for Waste Licence (W02332-01) for TechRec Ireland Ltd, the Licensee is seeking clarification regarding and/or amendment to, a number of the proposed conditions. ERM have been requested to submit this Objection to the EPA on behalf of TechRec Ireland Ltd, Unit 51, Park West Industrial Estate, Nangor Road, Dublin 12 (The applicant). A summary is provided as follows.

2.2.2.7 - Communications

"The Licensee shall establish and maintain a Public Awareness and Communications Programme to ensure that members of the public are informed and can obtain information..."

This condition appears to require an active public awareness raising programme. TechRec propose to maintain an on-site file outlining the facility's environmental issues and management strategies. This will be accessible to the public at all times during the facility's operation. In addition, the facility will maintain a site notice board as outlined in Condition 3.3.3. TechRec also maintain a web site (www.techrec.ie) that provides details about the company, outlines how the process works, products are handled and provides contact information. TechRec do not propose to undertake any other activities in relation to this condition.

Please confirm whether this is acceptable to the Agency and amend the wording of this condition as appropriate.

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Environmental Resources
Management Group

Directors
Sean O'Riordain
Colin Parker - British
Steve Laking - British



FS No. 68431
BS EN ISO 9001:2000

Environmental Resources Management

1

Proposed Waste Licence W0233-01

Directors
Sean O'Riordain
Colin Parker - British
Steve Laking - British

3.1 - Infrastructure

"The Licensee shall establish all infrastructure referred to in this Licence in advance of the commencement of the licensed activities..."

As the facility has already commenced operations under a permit issued by Dublin City Council, TechRec request permission to develop a plan under the site's EMP, to establish the necessary infrastructure.

Please confirm whether this is acceptable to the Agency and amend the wording of this condition as appropriate.

3.3.2 - CCTV System

"The Licensee shall install a CCTV system which records all truck movements into and out of the facility. The CCTV system shall be operated at all times and copies of the recording kept onsite and made available to the Agency."

The Licensee requests clarification as to how long the CCTV tape recordings must be held. TechRec request permission to hold the tapes for a period of 7 working days, after which they will be reused.

Please confirm whether this is acceptable to the Agency and amend the wording of this condition as appropriate.

3.6.3 - Drainage

"Drainage from these areas (being the Waste Inspection and Quarantine areas), shall be directed to SW1-5 as shown in Drawing No. 09 of the Application."

The Waste Inspection and Quarantine Areas are located inside the building. These areas are protected against leaks/spills and there are no drainage points or other means of direct access to drain SW1-5, which is located outside of the building. In addition, SW1-5 is a surface water drain and it is not considered an appropriate outlet for routine discharges which may arise in these areas.

The Licensee requests that this condition be deleted.

3.8.1 - Waste Handling and Processing

"Items of plant deemed critical to the efficient and adequate processing of waste at the facility (including, inter alia, waste loading vehicles and ejector trailers) shall be provided on the following basis:

- 100% duty capacity;
- 20% standby capacity available on a routine basis..."

When the facility is operating at its licensed volume (38,000 tonnes of waste per year), this will represent the maximum throughput capacity of the plant and associated equipment. No allowance was made for additional standby or spare capacity. The provision of such additional capacity would require the purchase of new plant and equipment (hammer mill, QZ machine etc), which is not considered feasible. This would also increase the environmental footprint of the proposed activity and would trigger a Licence review.

The Licensee is initially seeking clarification regarding the definitions of 'Duty' and 'Standby' capacity. If necessary, the Licensee will request that the reference to standby capacity be removed.

3.8.3 - Waste Acceptance

"The quantity of waste to be accepted at the facility **on a daily basis** shall not exceed the duty capacity of the equipment at the facility."

This condition does not allow for the stockpiling of material on site, which is a critical factor in the smooth operation of the facility. It must be recognised that the incoming waste stream is unlikely to be received in consistent batch sizes, and there may be extended periods where there is no incoming waste. Temporary and controlled stockpiling will allow the plant to continue to operate during such periods.

The Licensee requests that this condition be deleted, or amended to allow for the averaging of daily intake volumes (e.g. over a 3-month period).

3.11 - Silt Traps and Oil Separators

"The licensee shall install and maintain silt traps and oil separators at the facility to ensure that **all stormwater discharges from the facility pass through a silt trap and oil separator prior to discharge...**"

All waste processing, materials transfer activities (including refuelling of the diesel tank and goods inwards/outwards) and all storage activities associated with the licensed activity are undertaken inside a covered building, on sealed concrete floors. There are no internal drainage points and no direct access to any surface water drainage systems. External areas are covered with concrete hardstand and are used only for local traffic movements. There is no provision for long-term on-site parking.

It is considered that there is extremely limited potential for contaminants to enter the surface water system during normal site operations and the installation of a sediment trap and oil interceptor is not considered a technically feasible or cost-effective management option.

The surface water drainage on site is outlined in *Drawing 09: Site Plan with Drainage* of the application. As can be seen, surface water discharges from sites upstream of TechRec, discharge to the same drainage system and pass through the drainage system on TechRec's site prior to discharging to the main drainage system entering the site at SW1 and exiting at SW5. Any

installation of a silt trap and oil separator prior to discharge would require either:

1. the isolation of the site surface water drainage and connection/by-pass of the up-stream drainage system to a different point on the main drainage channel. This work would require access to, and work to be carried out on, land not owned or occupied by the applicant and permission from Dublin City Council to amend the drainage system on site and connection to their drainage system; or
2. the installation of a silt trap and oil separator sufficiently sized to handle surface water discharges from the licensed site and those areas up-stream discharging to the drainage system. This would also require permission from Dublin City Council and would place undue costs on the applicant to treat and monitor emissions not from the Site.

As the applicant was not involved in the development of the site, there was no potential opportunity for isolating the drainage on Site prior to the application. The applicant understood, from pre-application discussions, that the Agency felt that the risk of oil spills or leaks from the site was extremely limited and the applicant, therefore believed the potential requirement for an oil interceptor was not likely to materialise. Infrastructure was subsequently designed and installed at the site on this basis (e.g. the weighbridge). As a result, the retrofitting of an oil interceptor would be extremely technically demanding, and would most likely require the diversion of large sections of the drainage system in order to achieve the necessary invert levels.

The Licensee requests that this condition be deleted or, alternatively, that the condition be amended to allow the applicant to carry out a feasibility study and risk assessment with the aim of agreeing with the Agency control measures to prevent oil contamination reaching the surface water drainage system.

5.8 - Emissions - Issue: Firewater Containment

Non-trade effluent wastewater (e.g. firewater, accidental spillage) which is generated on site shall not be discharged to the sewer without the **prior authorisation** of the Sanitary Authority.

5.9 - Emissions - Issue: Firewater Containment

Unless otherwise agreed by the Agency, no trade effluent, leachate and/or contaminated stormwater shall be discharged to the surface water drains and surface water courses.

These two conditions impact on the management of firewater which may potentially be generated at the site. As there are no internal drains, there is no access to the foul sewer system within the building. Any excess firewater would flow outside of the building and would discharge to the external surface water and/or foul sewer drains. There is currently no provision for the on-site containment of firewater at the site. As more than 95% of the

materials handled at the facility are solids (predominantly metal and plastic), the risk of contamination of firewater is considered to be low.

The Licensee requests that these conditions be amended to require the conduct of a Firewater Risk Assessment prior to the site proposing appropriate strategies for the management of potential firewater.

8.10.5 - Waste Acceptance

"...There shall be **no casual public access** to the facility".

The Licensee intended to accept small loads of privately-generated WEEE (e.g. personal computers) from the public, should they present at the facility. The Licensee was not intending to advertise the use of the facility to the general public, but would provide this acceptance service when required.

The Licensee requests that reference to the general public within Condition 8.10.5 be deleted.

9.4.1 - Emergencies

"In the event of a breakdown of equipment or any other occurrence which results in a closure of the transfer station building, any waste arriving at, or already collected at, the facility, **shall be transferred directly to appropriate landfill sites or any other appropriate facility** until such time as the transfer station building is returned to a fully operational status..."

This condition appears to be intended for facilities which accept putrescible wastes and is not valid for a site which accepts only inert, solid wastes. The temporary stockpiling of WEEE on the site during any necessary repair works would not interfere with the work programme, or with the amenity of the site or the surrounding area. This condition also describes the facility as a "transfer station", although it is actually a recycling facility. The applicant feels that the description of the Site as a "transfer station" is not accurate or appropriate as it is a recycling facility.

The Licensee requests that this condition be deleted.

B.1 - Emissions to Air

"**Dust Deposition Limits.** To be measured at the monitoring points shown on Drawing No.20 of the Application (A1-1 and A2-1), or as may be amended under Condition 6".

It is noted that points A1-1 and A2-1 are the referenced locations of the two air emission stacks. These monitoring points are located inside final exit/vent pipes from the respective stacks, (as recommended in the EPA Guidance Note) and are not suitable for the measurement of dust deposition levels.

The Licensee requests that either (i) the monitoring technique and associated threshold be amended to allow for point source monitoring of particulates from A1-1 and A2-1, or (ii) the required monitoring locations be amended to allow for dust deposition monitoring.

B.2 Emissions to Storm Water

Emissions Points SW1 and SW5 on Drawing No. 20 are referenced as the required surface water monitoring points for the site.

It is noted that point SW1 is located upstream of the facility and receives surface water from off-site locations. The site cannot and should not be held responsible for ensuring that the water quality parameters listed in Schedule B.2 are met for incoming surface water.

The Licensee requests that the requirement to comply with the stated water quality parameters at SW1 be deleted from this Schedule, or an amendment be made to the condition which reflects the fact that it would be the difference in levels that would be an indication of levels emitted by the site.

C.2.1 - Control of Emissions to Water

This Schedule relates to the monitoring and maintenance of an oil interceptor.

In keeping with the discussion regarding Condition 3.11, the Licensee requests that this Schedule be deleted.

C.2.3 - Monitoring of Storm Water Emissions

This schedule relates to the monitoring of surface water from SW1 and SW5.

In keeping with the discussion regarding Schedule B.2, the Licensee requests that the reference to SW1 in this Schedule be deleted or an amendment be made to the condition which reflects the fact that it would be the difference in levels that would be an indication of levels emitted by the site.

C.2.1 - Control of Emissions to Water And C.2.3 - Monitoring of Storm Water Emissions

It appears that these conditions overlap since the only Emissions to Water are emissions through the Storm Water (describes as surface water in the application) drainage system.

The applicant requests that the Agency clarify if there is an overlap in the conditions and, if so, amend the conditions appropriately taking into

consideration the comments and suggestions previously made in relation to the conditions.

We thank you for the opportunity to comment on the proposed Licence determination and look forward to your response on the issues raised in this letter. Please don't hesitate to contact the undersigned should you wish to discuss any of the issues raised.

Sincerely yours,



Thomas Mc Carthy

(On Behalf of TechRec Ireland Ltd.)

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