



Environmental Protection Agency
An Ghníomhaireacht um Chaomhú Comhshaoil

Ms Mary Pyne
Director of Services
South Dublin County Council
Environmental Services Department, County Hall
Town Centre
Tallaght, Dublin 24

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County Wexford, Ireland

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09 January 2007

Reg No: W0227-01

Dear Ms Pyne

I am to advise you that the Agency has received an application for a Waste Licence from Lawlor Brothers Waste Disposal Ltd t/a Access Skip Hire, for a facility located at Lawlor Brothers Waste Disposal Ltd t/a Access Skip Hire, Unit 28, John F Kennedy Road, JFK Industrial Estate, Naas Road, Dublin 12.

The applicant proposes, as part of this application, to provide for the discharge of process effluent to a sewer, which the applicant has stated is vested in, or controlled by, your Council. Process effluent includes trade effluent or other matter (other than domestic sewage or storm water). I enclose copy extracts from the application form, which detail proposed discharges.

The provisions of Section 52 of the Waste Management Acts, 1996 to 2005, provides that the Agency shall obtain the consent of the sanitary authority to the proposed discharge from an activity which involves the discharge of trade effluent or other matter (other than domestic sewage or storm water), to a sewer vested in or controlled by a sanitary authority.

In order to expedite the Agency's consideration of this waste licence application, I am to request your authority's consent to the proposed discharge/s. It should be noted that, your authority's consent may be subject to such conditions as your authority considers appropriate as provided for in Section 52 of the Waste Management Acts, 1996 to 2005 and Section 99E(3) of the Environmental Protection Agency Acts, 1992 and 2003. Your attention is drawn to paragraphs (3) and (4) of the attached copy of the relevant section of the Act. For your convenience please find attached a reply form including a list of draft conditions compiled by the Agency.



In accordance with paragraph (2) of this section of the Act, you are requested to forward your response within 3 weeks of the date of this letter. Please note that any decision given after the expiry period shall be invalid and in those circumstances the Agency may proceed to determine the application concerned as if consent was obtained. Karen Creed is dealing with this matter and can be contacted at the Licensing Unit, Office of Licensing & Guidance Wexford, tel. nr: 053-916 06 00 if you have any queries.

Your co-operation in this matter is appreciated.

Yours sincerely,



Ewa Babiarczyk
Programme Officer
Licensing Unit

Section 99E (3) & (4) of the Environmental Protection Agency Acts, 1992 and 2003

- (3) Subject to subsection (4), a consent under subsection (1) may be granted subject to or without conditions and if it is granted subject to conditions the Agency shall include in the licence or revised licence concerned conditions corresponding to them or, as the Agency may think appropriate, conditions more strict than them.
- (4) The conditions that may be attached to a consent by a sanitary authority under this section are the following and no other conditions, namely conditions-
- (a) relating to-
 - (i) the nature, composition, temperature, volume, level, rate, and location of the discharge concerned and the period during which the discharge may, or may not, be made,
 - (ii) the provision, operation, maintenance and supervision of meters, gauges, manholes, inspection chambers and other apparatus and other means for monitoring the nature, extent and effect of emissions,
 - (iii) the taking and analysis of samples, the keeping of records and furnishing of information to the sanitary authority,
 - (b) providing for the payment by the licensee to the sanitary authority concerned of such amount or amounts as may be determined by the sanitary authority having regard to the expenditure incurred or to be incurred by it in monitoring, treating and disposing of discharges of trade effluent, sewage effluent and other matter to sewers in its functional area or a specified part of its functional area,
 - (c) specifying a date not later than which any conditions attached under this section shall be complied with,
 - (d) relating to, providing for or specifying such other matter as may be prescribed.

SANITARY AUTHORITY RESPONSE

re: SECTION 52 OF THE WASTE MANAGEMENT ACTS, 1996 to 2005

Name & Address of Sanitary Authority: South Dublin County Council, Environmental Services
Department, County Hall, Town Centre, Tallaght,
Dublin 24, ATTN: Ms Mary Pyne, Director of Services.

Waste Reg. No. W0227-01

Waste Facility: Lawlor Brothers Waste Disposal Ltd t/a Access Skip
Hire, Unit 28, John F Kennedy Road, JFK Industrial
Estate, Naas Road, Dublin 12

Waste Licence Applicant: Lawlor Brothers Waste Disposal Ltd t/a Access Skip Hire

Consent: Indicate Yes to one of the following statements:

Consent granted subject to the consent conditions outlined below	
Consent granted without conditions	
Consent refused ^{Note 1}	

Note 1 Where it is proposed to refuse permission the reasons for the refusal should be clearly outlined in the response.

GENERAL CONSENT CONDITIONS	Condition to be included (Yes/No)
1. No specified emission from the installation shall exceed the emission limit value set out in <i>Schedule B: Emissions Limits to Sewer</i> . There shall be no other emission to sewer of environmental significance.	
2. The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as out in <i>Schedule C</i> .	
3. Monitoring and analytical equipment shall be operated and maintained as necessary so that monitoring accurately reflects the discharge or emission.	
4. The licensee shall permit authorised persons of the Agency and the Sanitary Authority to inspect, examine and test, at all reasonable times, any works and apparatus installed, in connection with the process effluent, and to take samples of the process effluent.	
5. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activity is being carried on unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternative sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.	
6. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.	
7. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and to off-site points as required by the Agency.	
8. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing which is or may be liable to set or congeal at average sewer temperature or is capable of giving off any inflammable or explosive gas or any acid, alkali or other substance in sufficient concentration to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer.	
9. In the event of any incident which relates to discharges to sewer, having taken place, the licensee shall notify the Agency, Local Authority and Sanitary Authority as soon as practicable after the incident.	

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Waste Licence application Register No. W0227-01

Emission Point Reference No: _____

Parameter <i>(delete parameters which are not applicable)</i>	Monitoring Frequency <i>(e.g. monthly, quarterly, annually)</i>	Sampling Type <i>(grab, composite)</i>
Flow to sewer		
Temperature		
pH		
BOD		
COD		
Suspended Solids		
ADDITIONAL PARAMETERS <i>(if required)</i>		

SANITARY AUTHORITY CHARGES	
Charge per cubic metre of process effluent (per s52 of the Waste Management Acts, 1996 to 2005)	
Payment Frequency	
Annual Monitoring Costs	

Signed on behalf of South Dublin County Council

Date _____



Dr. Karen Creed
Licensing Unit
Office of Licensing and Guidance
Environmental Protection Agency Headquarters
PO Box 3000
Johnstown Castle Estate
County Wexford
Ireland

January 8th 2007

RE: Wheel and Truck Wash Water run-off on site at Lawlor Brothers Waste Disposal Ltd t/a Access Skips, JFK Industrial Estate, JFK Road, Naas Road, Dublin 12 - W0227-01

Dear Karen

Please find attached a copy of the proposed drainage system for the wheel wash and truck wash areas for the recycling facility at Lawlor Brothers Waste Disposal Ltd t/a Access Skips, JFK Industrial Estate, JFK Road, Naas Road, Dublin 12.

Please note that the wheel wash is not attached to the foul water drainage system, however the foul water piping runs beneath the wheel wash itself. The wheel wash drains into the surface water drainage system and into the southern most silt trap located at the north entrance of the site.

It is proposed that c. 9,500 tonnes of the total 95,000 tonnes to be collected by the Lawlor Brothers will be municipal waste. Trucks carrying this category of waste have the potential to contain contaminants not suitable for discharge to storm water. However, given that this category

of material represents only a tenth of the proposed waste to be accepted by the facility annually, the potential for contaminants entering the foul water system is low.

During the construction phase of the truck wash bay area a silt trap sump will be placed beneath the truck wash. This will minimise the amount of dirt and silt entering into the foul water system.

Approximately 18L water per minute is discharged from the Porto Tecnica Power Washer system presently used on site. On average, it takes 5 to 10 minutes to wash down a 20 tonne truck. For the purpose of this calculation, a wash down time of 7.5 minutes per vehicle was used. At present roughly 20 trucks per week are washed on site. It is estimated that with the proposed intake of 95,000 tonnes, roughly 126 trucks will be washed on site on a weekly basis. This calculates to an estimate 17,010L of water per week (884,520L per year) to be discharged into the foul water drainage system.

Waste Streams Clarification

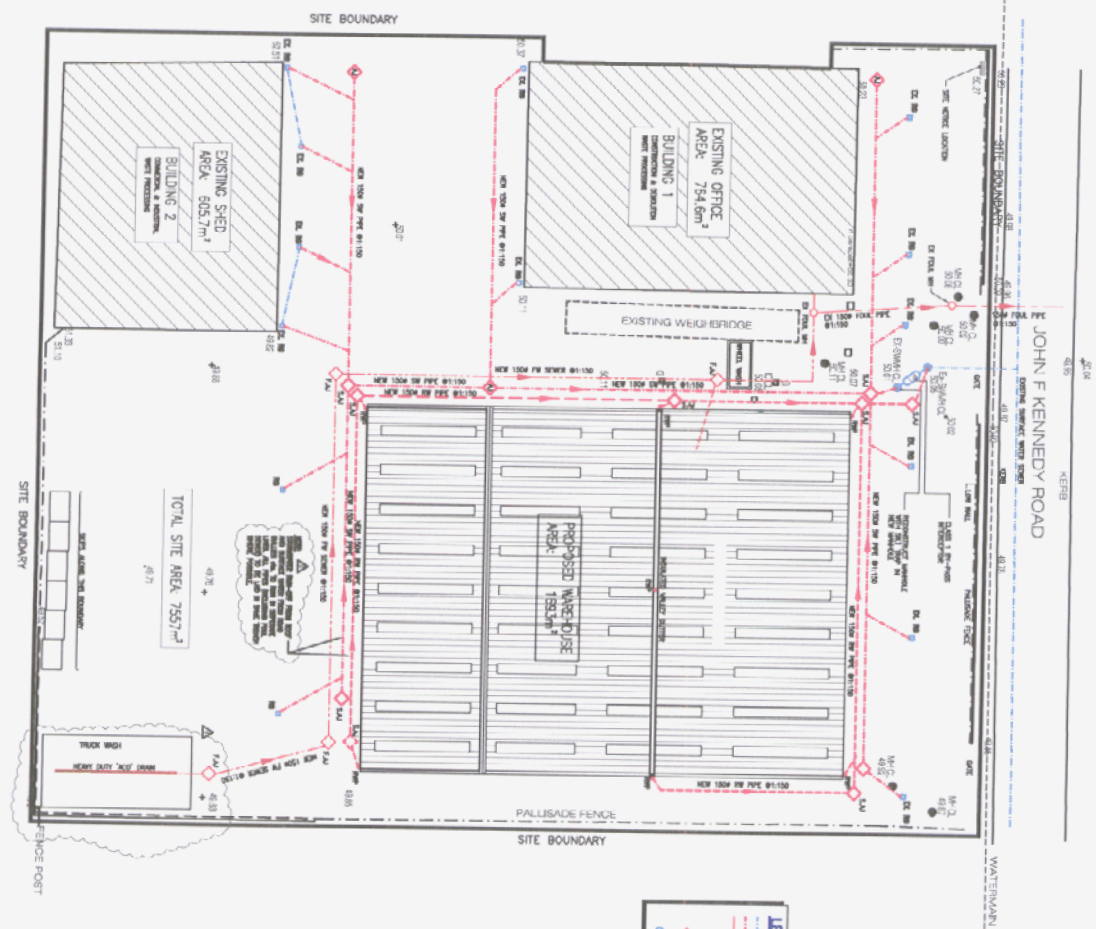
It was observed by agency staff that quantities of 'black bag' (municipal type waste) were present during a recent site visit. It is reported by Lawlor Brothers that occasionally, small amounts of this waste are collected by Access Skips in domestic skips or from house clear outs. At present this waste is segregated and sent off site for disposal at an appropriate licence facility.

A review of the proposed waste streams for the site are as follows;

The waste accepted on the site consists of dry solid non-hazardous waste. All waste is delivered to the facility by trucks. All skips are covered with netting or tarpaulin during transportation. On arrival, all recyclable waste is segregated and transferred to the relevant storage area. Non-recyclable waste is bulked up and transported to landfill.

Household Waste

Household waste is accepted at the facility mainly in the form of bulky waste collected in skips from house clear-outs. This non-putrescible waste comes in the form of furniture and other domestic construction and demolition waste. Currently this waste stream accounts for approximately 50% of the waste accepted at the facility. It is proposed to process approximately 9,500 tonnes/annum of domestic/municipal type waste at the new redeveloped facility. This will comprise a mixture of paper, cardboard, wood, metals, and



LEGEND

- EXISTING SURFACE WITH STAIRS
- EXISTING SURFACE WITH SLOPE
- EXISTING FLOOR SLAB
- NEW WASTE PILE
- NEW WASTE PILE "SPLIT" TRAIL
- ACCESS LAYOUT
- GENERAL PROTECTION

DO NOT SCALE. CORRECT TO SHOW ALL DIMENSIONS AND SPOT PER SCHEDULE OF WORK.

NO.	DESCRIPTION	AREA (m²)	VOLUME (m³)	HEIGHT (m)
1	EXISTING OFFICE BUILDING	754.6	1509.2	2.0
2	EXISTING SHED BUILDING	505.7	1011.4	2.0
3	PROPOSED WAREHOUSE	1923.4	3846.8	2.0
4	TOTAL	3183.7	6367.4	

JANOR BROS

1000 South Street
 Montgomery
 57060
 PA 19151

ACCESS WASTE NEW SORTING FACILITY

PROPOSED DRAINAGE LAYOUT

DATE: 01/31/2011
 TIME: 11:00 AM
 DRAWN BY: CAS
 CHECKED BY: JMS
 PROJECT: WASTE SORTING FACILITY