

Mr Martin Hogan
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06 February 2007

W0230-01

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

Dear Mr Hogan,

I am to refer to the above referenced application for a waste licence relating to a facility at Valeco, Ballard, Araglin, Kilworth, 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

GENERAL

- 1. Please resubmit data contained in the EIS in the format of the Tables in Annex 1 of the Licence application form.*
- 2. The application states that waste will not be accepted at the facility on Sundays or public holidays, except in emergency situations. Please clarify what is meant by emergency situations and with what frequency such events can reasonably be expected to occur.*

NOISE

- 3. Please submit an appropriately scaled map showing the noise monitoring locations.*



4. *Please re-submit the noise modelling maps in a format consistent with the key and with numbered contours. Please also indicate Noise Sensitive Locations on the noise modelling maps. Also provide smaller scale maps for the immediate vicinity of the facility as well as noise sensitive locations.*
5. *Please outline why the value of 150.0 dB(A) occurs for the L.1 and L.10 results for several of the data presented in Appendix 6.3.*
6. *Please explain the origin of the data tabulated in Section 6 of the Application, as some of the data and the dates of surveys do not concur with that provided in Appendix 6.3 of the Application.*
7. *Please reassess the noise monitoring data contained in Appendix 6.3 in light of the multiple overloads observed in the frequency analyses.*
8. *Please provide non-A weighted (i.e. linear) frequency analysis for the observed noise, as would be the norm for such an analysis.*
9. *Please clarify why the frequency analysis was carried out in 5 second intervals for each frequency instead of simultaneous monitoring of all frequencies for each location.*
10. *Please clarify why and comment on the significance of the fact that noise monitoring undertaken on the 6/3/2005 was less carried out for less than the guideline 15-minute period at locations N3 and N4.*
11. *Please reassess the possibility of tonal components within the data submitted.*
12. *Given the low level of L_{A90} noise observed and the quiet level of background noise, in line with the BAT note for the sector, the EPA guidance note for noise and international standards, please outline how the facility will meet a noise emission limits of 45 dB(A) for daytime and 35 dB(A) for night time.*
13. *Please provide proof of calibration for the noise meter for the period during which the monitoring was carried out on the 11/11/2004.*

WASTE QUANTITIES

14. *Please confirm the total estimated quantities of waste materials to be handled by the facility and an estimated breakdown of waste fraction.*
15. *Please clearly outline the nature of oils referred to in Section H.4 of the Application.*
16. *Please clearly itemise and quantify the estimated waste arising on-site.*
17. *Please outline the probability, possible quantity and proposed disposal/recovery method for any off-specification product generated at the facility.*

AIR

18. *Please provide details of the air emissions from the proposed facility as detailed in Annex 1 of the Waste Licence Application form and any parameters used as inputs into the air dispersion model.*

19. *Please submit maximum as well as percentile maximum ground level concentration levels and locations and submit appropriately scaled and contoured air dispersion maps, showing contour numbers as well as appropriate colour coding.*
20. *Please confirm the size of the biofilter.*
21. *Please outline the regularity with which the biofilter will need to be serviced and how waste arising from this will be handled and how odour abatement will remain effective during maintenance of the biofilter.*
22. *Please outline the nature of air emissions from the biofilter in terms of composition, temperature and flow rate.*
23. *Confirm whether or not there will be any storage of biogas at the facility and if not that all excess gas is to be flared. Please outline the envisaged frequency of such flaring.*
24. *Please confirm that only treated gas will be flared from the facility and that there will be no flaring or releases of raw untreated gas.*
25. *Please outline the procedure for the treatment of process water with reference to energy efficiency and the BREF document for common waste water and waste gas treatment in the chemical sector.*
26. *Please confirm the capacity of the vacuum evaporator unit and how it relates to the proposed evaporation rates from the cooling tower.*
27. *Please justify the use of weather data from Cork Airport and Fermoy for the site location in light of the topography of the surrounding area and outline any meteorological effects this local topography may have.*
28. *Please discuss the variation in dispersion patterns observed for each parameter on any of the figure submitted/to be submitted. In particular please outline the variation in dispersion pattern between NO_x and NO_2*
29. *Please clarify the assumptions made in the conversion ration of NO_x to NO_2 used in the air dispersion modelling.*
30. *Please submit a digital copy of the air dispersion model and all relevant input files (with any completed updates) in a format, which will allow assessment of the model by the Agency.*
31. *Please submit an appropriately contoured air dispersion map for odour, which will reflect the maximum-modelled hourly ground level concentrations (both maximum and percentile maximums).*
32. *Please indicate if the facility could meet an odour annoyance criterion of $1.0 \text{ ou}_E/\text{m}^3$ at the site boundary.*
33. *Please outline in detail the design of air emission point A-4 and justify its input as a point source for the purposes of air dispersion modelling. Please outline any implications for the air dispersion model presented.*

GEOLOGY & HYDROGEOLOGY

34. *Please outline what the purpose of the previous site investigation works were designed to achieve and confirm if any soil samples were analysed for their chemical composition.*

35. *Please provide an appropriately scaled map indicating the location of the trial pits described in the application.*
36. *Please provide any available soil chemistry data for the site.*
37. *Please characterise the nature and extent of any groundwater/subsoil contamination at the site, if any.*
38. *Please provide an explanation for description of "black staining or film on cobbles @ 3.9m" observed in Trial Pit No. 3 excavated on 4/9/1996, as presented in the application.*
39. *Please provide a piezometric map for the site, with separate maps for the bedrock and subsoil water piezoemtric surfaces.*
40. *Please discuss the vertical and horizontal flow gradients at the site.*
41. *Please provide a Source-Pathway-Target conceptual model for the site as is and for the proposed developed site, identifying any sensitive receptors.*
42. *Please outline the aquifer recharge on-site and how this may change due to the proposed development of the site.*
43. *Please provide a comprehensive discussion of the hydrochemistry results noting all exceedances of EPA Interim Guideline Values (IGVs) or any parameters elevated above normal, referring to the analytical results presented in the application.*
44. *Please provide original laboratory reports for the analytical data presented and carry out a cross check of data presented confirming any typographical errors.*
45. *Please provide any additional data available on monitoring wells BH3D, BH2D and BH2S, as apart from drilling logs provided and a mention of depth to bedrock in BH3D there is no further mention of these wells in the application.*

SURFACE WATER

46. *Please provide a comprehensive discussion of any parameters which appear elevated above background levels or in breach of any standards.*
47. *Please note if there are any similarities in the groundwater or surface water chemistry.*
48. *Please supply Drawing No. C003690-01 as referred to in the application. Also provide a clear process flow diagram outlining how stormwater will be managed on site.*
49. *Please indicate how the length of storm return period was chosen for the design of the facility and indicate why a longer return period would not be appropriate.*
50. *Please clarify the method and standards used in the sizing of the fire water control pond.*

ARTICLE 13 COMPLIANCE REQUIREMENTS

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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.

Please supply the information in the form of a one original plus two copies within **2 months** of the date of this notice. In addition submit sixteen copies of the requested information to the Agency in electronic searchable PDF format on CD-ROM. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is **W0230-01**. Please direct all correspondence in relation to this matter to *Noeleen Keavey, Licensing Unit, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



Mr. Kevin Motherway
Inspector
Office of Licensing & Guidance