

RILTA LTD

INTEGRATED WASTE MANAGEMENT FACILITY, GREENOGUE BUSINESS PARK



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Waste Licence Review Application

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MAY 2007



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CHECKLIST**Attachment B.1.**Applicant's Details

RILTA Environmental Ltd. (formerly known as SITA Environmental Ltd.)
Block 402, Grant's Drive,
Greenogue Business Park,
Rathcoole, Co. Dublin
Telephone: 01-4018000
Telefax: 01-4018080

The Company Directors are as follows:

Mr. Nick Beale

Mr. Padraig Duggan

Mr. Seamus Clancy

Mr. Sean Cotter

Mr. Paul Dixon

Mr. Michael Long

Mr.

Company Registration Number is 374837

Attachment B.1.

A Certified Copy of the Certificate of Incorporation or Memorandum and Article of Association and Certificate of Registration.

**RILTA Environmental Ltd.
Waste Collection Permit Application
Company Details**

Company Registered Office

Unit 402, Grants Drive
Greenogue Business Park
Rathcoole
Co. Dublin

Company Directors

Mr. Seamus Clancy
161 Foxrock Park
Foxrock
Dublin 18

Mr. Philip Lynch
Athgarvan Lodge
The Curragh
Co. Kildare

Padraig Duggan
117 Stepside Park
Stepaside
Co. Dublin

Mr. Paul Dixon
Hillcrest
159 Orwell Rd
Rathgar
Dublin 6

Nick Beale
3 Hyde Park Avenue
Blackrock
Co. Dublin

Mr. Michael Long
Woodview House
Farran
Ovens
Co. Cork

Sean Cotter
Acacia Lodge
Tithewer
Newtownmountkennedy
Co. Wicklow

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www.rilta.ie

Number 374837

Certificate of Incorporation on change of name

I hereby certify that

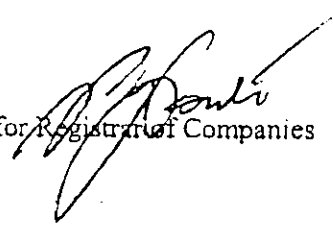
RILTA LIMITED

having, by a Special Resolution of the Company,
and with the approval of the Minister for Enterprise,
Trade and Employment, changed its name, is now
incorporated as a limited company under the name

RILTA ENVIRONMENTAL LIMITED

and I have entered such name on the Register accordingly.

Given under my hand at Dublin, this
Wednesday, the 1st day of February, 2006


for Registrar of Companies

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Attachment B.2.

Location Maps.

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Monitoring Point Locations (to National Grid Reference)

Groundwater Monitoring Points
 BH1 E301555, N 228440
 BH2 E301600, N228550
 BH3 E301630, N228555

Underground Settlement Tank Monitoring Points
 GW1 E301630, N228515
 GW2 E301650, N228540
 GW3 E301625, N228540

Surface Water/Invertebrate Monitoring Points
 SW1/KS1 E301670, N228562
 SW2/KS2 E301565, N228555
 SW3 (Proposed) E301480, N228560

Dust Monitoring Points
 D1 E301630, N228450
 D2 E301580, N228550
 D3 E301670, N228555
 D4 E301630, N228420

Noise Monitoring Points
 N1 E301630, N228450
 N2 E301580, N228550
 N3 E301670, N228555
 N4 E301630, N228420

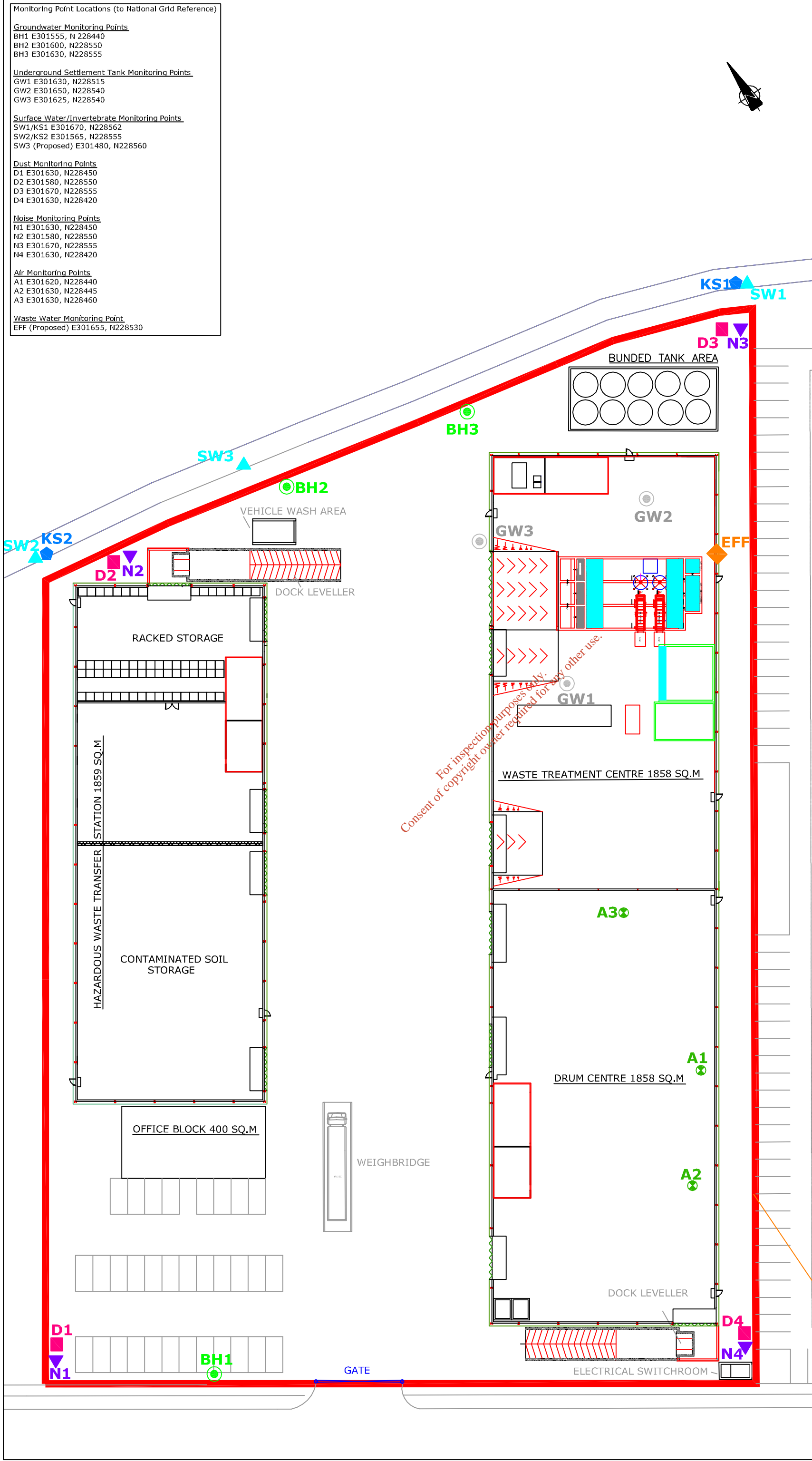
Air Monitoring Points
 A1 E301620, N228440
 A2 E301630, N228445
 A3 E301630, N228460

Waste Water Monitoring Point
 EFF (Proposed) E301655, N228530

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Legend:

- ▬▬▬▬▬▬ Licence Boundary
- ▲ Surface Water Monitoring Points
- ◆ Invertebrate Kick Sampling Monitoring Points
- Dust Monitoring Points
- ▼ Noise Monitoring Points
- ◆ Waste Water Monitoring Point
- Groundwater Monitoring Points
- Underground Settlement Tank Monitoring Points
- ⊗ Air Monitoring Points



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- Notes:
1. Figured Dimensions only to be taken from this drawing
 2. All Drawings to be checked by the Contractor on site
 3. Engineer to be informed of any discrepancies before any work commences
 4. All levels relate to Ordnance Survey Datum at Mean Head

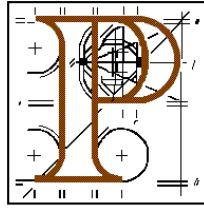
Client	date	Int.
Drawing Title		
SITE LAYOUT PLAN		
Project		
INTEGRATED WASTE MANAGEMENT FACILITY, GREENOGUE, CO. DUBLIN		
Scale: 1/500	Checked by	Date
Drawn by	DAMIENGREHAN	January 2007
ENGINEER IN CHARGE: DAMIEN GREHAN		
 B-3-157 BLANCHARDSTOWN CORPORATE PARK, DUBLIN 15, IRELAND TEL: 01 8036611 FAX: 01 8036410 email: info@tobin.ie 		
Drawing No.		
1250/01/1002		
Rev.		

Attachment B.3.

The most recent planning permission: attached with conditions, and the most recent EIS, Waste Licence and Annual Environmental Report.

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An Bord Pleanála



Inspector's Report

PL06S.201534.

PROPOSED DEVELOPMENT: Integrated Waste Management Facility and Ancillary Development.

LOCATION: Greenogue Industrial Estate, Greenogue, near Newcastle, Rathcoole, County Dublin.

PLANNING APPLICATION

Planning Authority (P.A.): South Dublin County Council.
P.A. Reg. Ref.: SD 02A/0313.
Applicant: SITA (Ireland Ltd.).
Application Type: Permission.
P.A. Decision: Grant permission subject to conditions.

PLANNING APPEAL

Appellants: Newcastle Lyons and District Residents Association and SITA (Ireland) Ltd.
Types of Appeal: Third Party –v- Grant
First Party –v- Conditions
Site Inspection: 27 April and 25 June 2003
Appendices: Site Location Sketch; Development Plan Extracts; Photographs and Key Map.

INTRODUCTION

There are two appeals in this case. One is a third party appeal essentially against the principle of the development. The other is a first party appeal against six conditions proposed by the Planning Authority in its Decision to grant permission. Each of the conditions appealed is in respect of financial contributions being levied by the Planning Authority under the aegis of the planning permission proposed.

The planning application is accompanied by an Environmental Impact Statement (EIS).

The waste management facility proposed in this case would be subject to a licence under the relevant Waste Management legislation.

I have read the file and inspected the site.

PLANNING HISTORY

The Senior Planner's Report for the Planning Authority, prepared prior to the Decision in the case, refers to five history cases under South Dublin Reg. Nos. S02A/0065, S00A/0153, S01A/0868, S02A/0073 and S02A/0301. These cases may be summarised as follows:-

S02A/0065 (PL06S.130047):

Permission granted for 33,774 square metres warehouse/light industry including 7,736 square metres office accommodation. The final permission granted in this case was by An Bord Pleanála under PL06S.130047 in December 2002.

S00A/0153 (PL06S.119779):

Permission granted for 'Phase 3' industrial estate road construction and site development works.

S01A/0868:

Permission granted for a waste transfer and recycling facility within the 'Phase 3' area of industrial estate.

S02A/0073:

This is described as an application to construct a yard for recycling of waste timber to manufacture pulp substitute fibre together with office store, service facilities and site development works and related development, in respect of which clarification of additional information had been sought by the Planning Authority at the date of the Planner's Report in the current appeal case. At the time of preparation of my report in the current appeal case, it is understood that this planning application is the subject

of a formal 'time extension' granted to the Planning Authority to process the application.

SD2A/0301:

This is described as an application on a site to the east of the current appeal site within Greenogue Industrial Estate, understood to be in respect of a waste facility. At the date of preparation of my report in the current appeal case it is understood this proposal was granted permission (no appeal) in November 2002.

An Bord Pleanála has adjudicated on several cases in the area in recent years. Two of these cases have already been referred to above under Appeal Ref. Nos. PL06S.130047 and PL06S.119779. Other appeal decisions taken in the vicinity may be briefly summarised as follows:-

PL06S.119777 (S00A/0152):

Permission granted Phase 2 Greenogue Industrial Estate roads and site development.

PL06S.119780 (S00A/0154):

Permission granted temporary proprietary treatment plant Greenogue Industrial Estate.

PL06S.117589 (S99A/0339):

Permission granted for 50,310 square metres warehouse/light industry with ancillary office accommodation.

PL06S.098684 (S95A/0565):

Permission granted light industrial space, extended sewage treatment plant Greenogue Industrial Estate.

PL06S.130369 (S02A/0099):

Permission granted for site development works, Phase 4 Greenogue Industrial Estate.

PROPOSED DEVELOPMENT AND P.A ASSESSMENT

Proposed Development

The proposed development is described in the planning application and public notices as follows:-

“An integrated Waste Management Facility, which consists of four components, namely:-

- Hydrocarbon waste treatment centre (1,858 square metres);

- Drum recovery centre (1,858 square metres);
- Hazardous waste transfer station (1,859 square metres), and
- Non-hazardous waste recycling centre (3,251 square metres)”.

The proposed development is stated also to include:-

“Additional ancillary infrastructure including:-

- Site administrative building (200 square metres);
- 4 no. weighbridges;
- 2 no. reception kiosks (14.44 square metres);
- 2 no. bunded fuel storage tanks (20 square metres);
- Site roads;
- Surface and foul water drainage;
- 2 no. stormwater attenuation tanks;
- 2 no. firewater retention tanks, and
- Car and truck parking areas”.

There is reference in planning notices to previous planning permission application S02A/0065 “...granted on 01/05/2002 for this site”. [This is/was the appeal case PL 06S. 130047].

Notices confirm that an EIS accompanies the planning application and that a waste licence application is to be submitted to the Environmental Protection Agency (EPA) in respect of the proposed development.

Further basic information provided in the planning application includes the following:

- Site area stated to be 2.07 hectares;
- Gross floor area space of new building 9044.44 sq.metres
- Source of water supply South Dublin County Council main arterial supply from Ballymore Eustace;
- Method of surface water drainage proposed is to the Griffeen River (tributary of River Liffey) which abuts the northern site boundary: drainage will be via attenuation storage tanks: all surface water on site will be contained by reason of concrete paving throughout (Sections 2.9 and 4.8 of E.I.S. refer).
- Foul drainage is to public sewer;
- The European Communities (Control of Major Hazards including Dangerous Substances) Regulations, 2000 do not apply to the proposed development.

Planning Authority Assessment

Initial assessment by the Planning Authority drew no objection from the Roads Department or the Fire Officer, while the Health Officer accepted the proposal subject to conditions. Certain further information was sought by the Environmental Services and the Parks Departments of the Planning Authority. The Planning Report drew attention to the ‘E’ zoning of the site “to provide for industrial and related uses”, where the main development of the type proposed would be ‘permitted in principle’ and ancillary offices would be ‘open for consideration’. The Report queries the

adequacy of the non-technical summary in the EIS and opines that the types of hazardous waste proposed to be catered for are vague, and cumulative impact (having regard to other similar proposals) appears not to have been adequately addressed. The report also states some concerns in respect of noise impact/hours of operation, employee numbers, and landscaping.

Planning Application and E.I.S.

The original planning application and E.I.S. were further clarified through the submission of further information received by the Planning Authority on 14 November 2002. In the context of the current appeal, the following information may be noted.

- regarding the potential cumulative impact of the proposed development, it is submitted by the applicant that existing and proposed facilities – designed or capable of handling hazardous waste – are significantly different from “operational and waste handling” perspectives: there are distinct differences which will allow them operate in a manner which will not create a cumulative impact which will have a negative effect on the environment;
- details of the exact nature and quantities of each type of waste which it is proposed to handle is available: this includes up to 57,500 tonnes of hazardous waste per annum: Table 3 in further information submitted to the Planning Authority sets out the hazardous waste to be handled, which ranges in volume from 100 tonnes per annum (such as wood preservation waste and agro-chemical waste) to 10,000 tonnes per annum (such as waste oil sludges/interceptor waste);
- for safety and general management purposes the appeal site is to be divided into Zone A and Zone B. Zone A is proposed to contain the Drum Recovery Centre, the Hydrocarbon Waste Treatment Centre and the Hazardous Waste Transfer Station: all buildings in Zone A will be bunded to contain potential spillages: all entrance ways to the building will be ramped downward into the building from the top of the curbing surrounding the relevant buildings;
- regarding noise during construction, site activity associated with construction is predicted to result in maximum hourly Leq values of 54.1 dB(A) at the nearest residence west of the development and 50.7 dB(A) at the nearest residence south east of the development;
- regarding noise in the operational phase the noise emissions from the proposed development is predicted to have a negligible noise impacts at residences and there will be no tonal or impulsive components in the emission: mitigation measures proposed in the interest of noise control, which have been incorporated into the design, include the following:
 - fixed plant within housing envelopes giving sound reduction of the order of 20 dB(A);
 - doors of buildings opening only for access purposes;
 - routine servicing of fixed and mobile plant;

- trained operation of all machinery by operators;
 - wooden materials covering hardstands in truck loading/off-loading areas to prevent impulsive sounds;
 - air extraction where necessary will be enclosed within main buildings inside acoustic enclosure;
- road access is proposed from the N7 (Dublin-Naas-Limerick road) via the R120 Regional Route (Rathcoole-Newcastle-Lucan).

Planning Recommendation

Arising from the further information submitted including clarification of E.I.S, the planning recommendation for the Planning Authority was to grant permission subject to conditions.

DECISION, APEAL AND RESPONSES

P.A. Decision

The Planning Authority decided to grant permission subject to 20 conditions by order dated 12 December 2002. In the context of the current appeals, attention is drawn in particular to Conditions Nos. 2,3,7,14,15,16,17,18,19 and 20 covering matters of annual throughput of waste, drainage, noise control, working hours and financial contributions including a proposed contribution in respect of road works improvements and traffic management.

The Appeals

Third party and first party appeals have been submitted in this case.

Third Party Grounds of Appeal

The grounds of appeal contained in the letter of 3 January, 2003, may be summarised as follows:-

- the combined impact of existing/proposed waste management operations at Greenogue Industrial Estate has not been assessed;
- vehicles carrying waste will be generated in large numbers through parts of Newcastle Village and the R120 Regional Route between the N4 and Lucan and Greenogue Industrial Estate, causing disturbance and exacerbating traffic congestion;
- new development proposed for Adamstown combined with traffic generated from Greenogue Industrial Estate will further exacerbate traffic congestion in the area;

- fire authorities do not know the contents of hazardous waste cargoes, therefore the proposed development is a source of threat to public safety by reason of the cargoes attracted and/or generated;
- proposed development forms part of the development of an industrial area incorporating a distributor road which will facilitate access to/from the Aylmer Road which is inadequate to cater for the traffic generated, moreover, there are no proposals to upgrade the Aylmer Road;
- the use of the inadequate Aylmer Road for the transport of hazardous waste would pose a serious risk to public safety;
- the use of the R120 for the transport of hazardous waste would pose a threat to public safety by reasons of schools and residential areas adjoining that road in the Newcastle and Lucan areas;
- road infrastructure generally is inadequate;
- the R120 road has a history of accidents;
- there are concerns regarding noise and odours;
- lands in the vicinity of Greenogue Industrial Estate have been zoned residential, therefore a recycling facility appears inappropriate;
- proposed development, taken in conjunction with existing development, would pose a water pollution threat to the Griffeen River.

First Party Grounds of Appeal

The first party grounds of appeal are common to each of the six conditions appealed (Nos. 15, 16, 17, 18, 19 and 20). It is submitted quite simply that the conditions are unreasonable having regard to:-

- the nature and extent of development and
- the laws governing the imposition of financial contribution conditions.

Response(s) to Appeals

The Planning Authority responded to the appeals in correspondence dated 6 February, 2003, and 10 February, 2003. The letter of 6 February, 2003, refers to the first party appeal against conditions and encloses a reasoned response explaining the basis of calculations for the relevant conditions proposed. Fourteen pages of text which address specifically the conditions appealed are supported by a further twenty-eight pages of appendices comprising details of scales of contributions agreed and confirmed in official managerial orders. An increase in roads' contributions was set on 5 March, 1999. The levies applicable for developments facilitated by certain water supply enhancement and extension schemes were set with effect from 15 July, 2002. The scheme for the setting of contributions relating to a Griffeen River flood alleviation scheme was confirmed with effect from 19 September, 2002. A sewer

infrastructure financial contribution(s) scheme in respect of Saggart/Rathcoole and Newcastle Main Drainage Improvement was confirmed effective on the same date. Finally, a Greater Dublin Drainage Improvement Scheme of contributions was also confirmed effective 19 September, 2002.

The Planning Authority letter of 10 February, 2003, refers to the third party appeal. It states that the Planning Officer has no further observations and requests that An Bord Pleanála note the relevant Planner's Report proposed in connection with the Decision in the case.

Applicants' Response to Third Party Appeal

The applicants responded to the third party appeal under cover of a letter dated 13 February, 2003. This letter and accompanying submission were prepared by Vincent J.P. Farry & Company Ltd., Planning & Development Consultants.

The submission for the applicants is set out in ten sections and runs to over 20 pages plus photographs. In the context of the current planning appeal, I wish to draw attention to the following points included in the submission, which I set out in summary form:-

- Greenogue Industrial Estate is an established industrial area currently experiencing growth and development;
- the industrial estate accommodates uses ranging from warehouse and distribution to specialist operations such as waste management;
- the property contains no trees, vegetation or structures of any significance;
- site forms part of land the subject of a permission granted by An Bord Pleanála under PL06S.130047 (South Dublin Reg. No. S02A/0065);
- another appeal case determined by An Bord Pleanála in the area (under Ref. No. PL06S.130369, i.e. South Dublin Reg. No. S02A/0099) in respect of development comprising site works of Phase 4, Greenogue Industrial Estate, does not restrict the type of activities or processes to be undertaken in this area;
- there is a history of permissions granted for waste transfer and recycling facilities in Greenogue Industrial Estate, notably South Dublin County Council SD1A/0868 and SD02A/0301: these permissions had conditions attached, amongst others limiting the annual throughput of waste to 25,000 tonnes and 60,000 tonnes of waste, respectively;
- the hazardous waste transfer station element of the proposed development will be for receipt and storage of wastes only, pending distribution to specialist treatment centres: no 'treatment' will take place on site;

- the proposed development received a positive assessment and recommendation from the Planning Authority technical staff: there were no Engineering or Environmental Services objections;
- proposed development would be consistent with national policy on waste recovery/collection/recycling and disposal;
- proposed development location is consistent with the waste policy provisions of the Development Plan which in turn was prepared/adopted against a background of evolving official waste policy;
- proposed development is consistent with the land use zoning provisions of the Development Plan;
- the proposed development would not have significantly different traffic implications from that arising from the extant permission covering the appeal site, and moreover the EIS envisages a lesser traffic impact arising from the proposed development (relative to the extant permission) for this section of the Greenogue Industrial Estate;
- the conclusions of the EIS do not support the reservations of third party appellants in respect of amenity concerns;
- pollution of the Griffeen River is being prevented by appropriate design considerations and solutions;
- there will be some but limited 'crossover' in the waste storage activities proposed in the current planning application and in neighbouring/nearby permitted facilities.

An Bord Pleanála is urged to conclude that the proposed development is in accordance with the proper planning and development of the area and accordingly to grant planning permission.

The submission includes photographs (understood to show parts of the existing industrial estate).

Third Party Response To First Party Appeal

The third party appellants do not appear to have submitted any observations on the applicants' appeal against conditions.

Observer Submission

By letter dated 27 January, 2003, an 'observer' submission was submitted by Rathcoole Community Council Ltd.

The main points of this submission may be summarised as follows:-

- road infrastructure in the area is inadequate for the delivery and removal of toxic waste;
- there is concern regarding leakages from toxic waste;
- the site is proximate to Baldonnell Airport, increasing the risk (to the public) in this case because of possible tourism.

Planning Authority Reply to An Bord Pleanála letter regarding Conditions

In response to an An Bord Pleanála letter dated 17 February, 2003, the Planning Authority submitted certain observations in a letter dated 26 February, 2003.

These may be summarised as follows:-

- details of development contributions' calculations are set out in the Planning Authority letter of 6 February, 2003;
- total payments received by the Planning Authority within the period 1996 to 2002 are set out "Schedule 1" (attached to this Planning Authority submission 26 February 2003).
- it is difficult to forecast future level of contributions for the period 2003 – 2009 because of variable factors;
- An Bord Pleanála is urged to uphold the Planning Authority conditions consistent with the track record of the Board in respect of financial contributions' conditions in other appeals.

Further Correspondence on Conditions Appealed

The Planning Authority observations on the first party appeal were circulated to appeal parties for information and any observations. In addition a response of the Planning Authority – to correspondence from An Bord Pleanála in connection with the calculation of conditions (letter dated 17 February 2003 refers) – was also circulated to appeal parties.

The applicant party responded to the circulation of these submissions in letters dated 27 February 2003 and 12 March 2003.

The letters include certain observations as set out below.

Regarding the detailed submission for the Planning Authority (6 February 2003):

- the Planning Authority has written directly to client/applicant confirming that a lesser contribution will be required (copy of Planning Authority letter to engineers for applicants [submitted to An Bord Pleanála with applicants submission] dated 13 January 2003, refers).

- the lesser contribution proposed remains unduly high overall;
- applicants have no objection in principle to making a reasonable contribution towards infrastructure;
- the application of development levies for works not specifically related to facilitating a development are unlawful as in the current appeal case;
- costs proposed to be recouped through Condition No. 15 are operational in nature: it is therefore not valid to levy a development levy in respect of these items, moreover some of the facilities described will not facilitate the proposed development;
- the link between levies proposed and road infrastructure undertaken/being undertaken is not clearly shown in Condition No. 16, further more the data presented makes no assessment of previous payments, outstanding contributions (existing permissions not yet taken up) or amounts likely to be generated from future development;
- reference to a Village and Urban Renewal Improvement 2001 is largely irrelevant to industrial development proposed in the current appeal case;
- the contribution being levied under Condition 16 is excessive relative to other recently determined appeals e.g. S01A/0868 and SD02A/0301;
- regarding proposed Condition No. 17, the applicant party has no objection to the reduced levy of €46,468 set out in the Planning Authority letter to applicant dated 13 January 2003;
- regarding Condition No. 18, flood alleviation works in Lucan are not relevant to the currently proposed development, such a levy was not applied to other similar development in the area (e.g. S02A/0065) and there has not been enough data presented to underpin the logic of the contribution proposed;
- regarding proposed Condition No. 19 the applicant raises no objection to this levy;
- regarding proposed Condition No. 20, notwithstanding a lesser contribution being sought in the Planning Authority letter to applicant (13 January 2003) the works described are irrelevant to the currently proposed development and therefore should not be levied.

The submission in relation to the initial response of the Planning Authority includes a copy of a letter to South Dublin County Council planning department dated 13 January 2003 as referred to in the main text of the submission.

Regarding the supplementary information presented to An Bord Pleanála by the Planning Authority, the applicant party submits:

- key points in the applicants submission have been ignored by the Planning Authority, tacitly acknowledging that certain amounts sought through financial contributions are not justified;
- future income from levies has not been estimated: estimates could have been prepared: provision of information on costs without information on income is unsatisfactory, and should not be tolerated in the context of justifying levies on developers;
- applicant party does not accept that An Bord Pleanála has consistently upheld rates applied in financial contributions conditions by the Planning Authority, in the past.

Environmental Protection Agency (E.P.A.)

Notification of the current planning appeal was made to the E.P.A. by An Bord Pleanála on 8 April 2003. The E.P.A. has acknowledged the notification, but at the time of preparing my report, there has been no substantive submission received. The E.P.A. confirms in its letter of 21 May 2000 that if/when a Waste Licence application is received, environmental issues will be taken into account by the E.P.A. in considering any license.

DEVELOPMENT PLAN

Sections of the South Dublin County Council Development Plan 1998, which may be considered relevant in the context of the current appeal, are highlighted on extracts from the Plan, attached herewith to my Report.

SITE DESCRIPTION

The site and its context are described in Section 2.1 and 2.1.1 of the E.I.S. Photographs attached herewith to my report help to illustrate the character of the site and its environs. The site forms part of a developing area of modern industrial estate, where the road infrastructure has been developed and the overall form of the estate is taken shape.

In an area generally south-east of the appeal site there are established industrial buildings which appear to comprise the original Greenogue Industrial Estate. The estate has an established sign posted access to/from College Road which forms part of the upgraded road infrastructure of the area outside the industrial lands. Access to the appeal site is to be to/from the R120 where there is a roundabout junction with College Road a short distance west of the (older) established access to which I refer above. Access to the modern industrial estate lands is sign posted as “Greenogue Square”, however the description Greenogue Industrial Estate appears to apply generally to all of the developed and developing industrial estate lands in the immediate area.

At the dates of my site visits there appeared to be no distributor road connection with the Aylmer Road, referred to in the third party appeal). Details of this element of the proposed road infrastructure for the area have not been presented in the current appeal. I drove the Aylmer Road in the vicinity of Newcastle. At its town (Newcastle) end the road is a 6 metre road with footpaths and characterised by direct frontage residential development. Further north the footpaths become intermittent, with occasional frontage development, to a point where it crosses a stream, where there is a minor road junction linking back to industrial lands. North of this point the Aylmer Road becomes a winding rural road without footpaths and with a typical width of the order of 5 metres.

The Aylmer Road connects with the R120 west of Greenogue Square/Industrial Estate. West of this junction, within the central area of Newcastle there are traffic calming ramps at certain locations including immediately west of the Aylmer junction with the R120, and at the junction of the R120 with the main Newcastle – Celbridge Road.

ASSESSMENT

Principle of Development

Having regard to the land use zoning provisions of the Development Plan, the pattern of development in the area and the site history, it is considered that there should be some presumption in favour of the granting of permission in the current appeal case.

I now propose to assess the appeal by reference to the stated grounds of appeal(s) and any other relevant considerations.

Cumulative Impact Development in the Area

At planning application stage the Planning Authority raised with the applicants the matter of cumulative impact of development having regard to other developments and permissions granted in respect of waste facilities in the area. There was a formal response to this issue as raised by the Planning Authority. Notwithstanding that the Planning Authority considered the formal response of the applicants on this matter of cumulative impact to be generally acceptable, the appellants have raised the issue in the current appeal.

In the context of information presented in the E.I.S. and otherwise and prior to the Decision of the Planning Authority, I consider the third party submission under this heading to be largely unsubstantiated. The applicants have drawn attention to the differences in the detail of operations and activities as between existing/permitted and currently proposed development. I accept the judgement of the Planning Authority in the matter in this case. It may be noted also that several of the headings in respect of which the cumulative impact has been addressed include matters relevant to assessing any threat of environmental pollution. Conditions appropriate to limiting emissions and discharges to minimise and prevent environmental pollution can be imposed by the E.P.A. in the context of any Waste Licence, providing further safeguards. Other matters appropriate to regulation directly under the planning code insofar as they have

been raised as crucial issues in the appeal, are addressed elsewhere in my assessment, below.

Roads and Traffic Issues

The volumes of traffic generated to/from the proposed development would be significantly less than that generated by development which could be carried out under the aegis of the extant planning permission covering the appeal site (source:E.I.S.). The Roads Department has not objected to the proposed development. The R120 is an officially designated Regional Route and must therefore be deemed suitable for the routine movement of heavy goods vehicles. The single line traffic signalled arrangement at “12th Lock Canal Bridge”, described by third party appellants and noted by me in the context of a visit to the area, must be seen as a less than perfect arrangement. However this arrangement is designed to enhance traffic safety and flow etc. I note the stated intention of accessing the appeal site by way of the N7 via the R120, i.e. routing east of Greenogue Industrial Estate, where properly designed grade separated intersections exist at the N7.

Regarding the Aylmer Road, I accept this is not a suitable route for additional heavy goods vehicular traffic. At the moment the road system as constructed would not cause the proposed development to generate traffic onto this road. In the longer term any risk of additional traffic on this road should be counterbalanced by upgrading and/or traffic calming as appropriate. Accordingly in the event of An Bord Pleanála granting permission in the current appeal case I would recommend that any financial contributions’ conditions in respect of roads should specifically include and make reference to traffic management including any appropriate traffic calming.

Having regard to these observations, I do not consider that traffic generated by the proposed development would adversely affect the residential amenities of property in the Newcastle area, or be a source of traffic hazard or an otherwise serious inconvenience or obstruction to road users.

Public Safety

The main public safety issue raised by third party appellants is in respect of transport of hazardous waste through populated and/or substandard roads. I consider the movement of hazardous materials including wastes to be regulated by industry standards and otherwise by statutory requirements outside the scope of consideration in the context of the current planning appeal. The safety of the road network is not compromised (rather it is enhanced) by engineering interventions such as traffic calming and traffic signals at “12th Lock” as referred to in the appeal. If the capacity or the convenience of the R120 is compromised or perceived to be compromised by such features, there should be a disincentive to its use by additional traffic. As stated above, the planning application documentation proposes access to/from the site from the N7 via the R120.

I note that the proposed development does not come within the scope of the “Saveo II” Directive relating to potential major accident sites. The site/proposed for development would not be an “establishment” within the meaning of the Directive or statutory Regulations prevailing in Ireland.

I note also that the Fire Authority has not raised objection to the proposed development.

Noise and Odours

Noise has been addressed by the Planning Authority in its planning assessment and through a planning condition. I have noted the content of the E.I.S. and additional information received, prior to the decision in the case. The matter of working hours has also been addressed by the Planning Authority, which has implications for noise impact. I consider the approach of the Planning Authority to be acceptable and appropriate.

Regarding odours, this is a matter amenable to control under any Waste Licence decision. The activities associated with the proposed development are licensable by the E.P.A. under Waste Management Legislation. The E.P.A. has confirmed the position in its letter to An Bord Pleanála received on 22 May 2003.

Zoning Conflict

I have studied the Development Plan and a relevant Plan Variation and the relevant zoning map for the area, which forms part of the Development Plan. I do not see an inherent conflict in the juxtaposition of zones. Moreover the appeal site is located deep within the industrial zone, which reduces the necessity for special consideration to be given to any more sensitive adjoining landuse zone: such does not abut the current appeal site.

Water Pollution

The E.I.S. mitigation and the design of the proposed development address the matter of water pollution prevention. In essence a concrete apron will underly the activities being conducted on site and all building units will be bunded in accordance with good practice. The attachment of any condition considered appropriate to avoid or minimise pollution is a matter for the E.P.A. under the aegis of Waste Management Legislation.

Conditions Appealed

The applicants have appealed planning conditions prepared by the Planning Authority. I shall address these in numeric order as raised in the appeal. In addressing these conditions, it is important to note the Planning Authority has offered no reductions in the financial contributions' sought. In particular no provisions to calculations have been put forward. On the other hand the Planning Authority has written directly to the applicants (letter dated 13 January 2003 refers), reducing certain contributions sought. The applicants remain dissatisfied with even the reduced amounts contained in this correspondence.

Notwithstanding the clarification/amendment offered to the applicant, the appeal correspondence for the Planning Authority apparently seeks to uphold the amounts formally attached to the Decision in the case, accordingly, as the letter of 13 January

2003 from the Planning Authority to the applicants must have created a reasonable expectation that the lower amounts would apply to any conditions upheld by An Bord Pleanála, I consider it appropriate to work on the basis of these amended figures being the upper limit of levies applicable, where deemed applicable by An Bord Pleanála in the current appeal. I wish to comment also that in the case 06S. 130047, one standard financial contributions' condition covering "works" was attached to the permission granted by An Bord Pleanála. In that case however, there was no appeal against conditions. Accordingly, I propose to address the individual conditions as follows.

Condition No. 15 Public Services

I understand the thrust of the appeal. However I consider the term "public services" used by the Planning Authority may be replaced by "works", in the interest of clarity. Contributions are intended to relate to capital works facilitating development. The fact that the works are physically remote from the proposed development is not a crucial consideration, if they contribute towards facilitating towards facilitating the development.

I consider the spirit of the condition should be upheld but an amount should not be specified. The Planning Authority must legally restrict itself to a levy towards works facilitating capital development, which on reflection may result in an amended amount. The subject of any later dispute could be determined by An Bord Pleanála.

Condition No. 16 (Road Improvement and Traffic Management)

Adequate road infrastructure is critical to the establishment of sustainable Waste Management facilities including such as the waste transfer proposed in the current appeal case. The Planning Authority submits that it is difficult to forecast future income. I consider there is no such uncertainty in relation to the need to cater for waste management. Accordingly, I consider the Planning Authority condition should be generally upheld with an amended figure to take account of the Planning Authority letter to applicants dated 13 January 2003.

Condition No. 17 (Water Supply)

The applicant would be satisfied with a reduction to €46,468 as stated in the Planning Authority letter to applicants of 13 January 2003. I consider the relevant condition should be attached with the amended figure incorporated, and using the wording normally employed by An Bord Pleanála.

Condition No. 18 (Flood Alleviation Scheme)

I consider that it is fundamental to any sustainable development policy for a river catchment that the catchment is viewed as a whole. The Planning Authority is specific in its description of the flood alleviation programme as being in respect of the Griffeen River, which joins the Liffey in the vicinity of Lucan. Notwithstanding surface water attenuation proposals contained in the design for the proposed development, I consider that the development must be seen as relevant to any considerations of storm water management at least above the confluence of the Griffeen with the Liffey within the Griffeen catchment. I consider therefore that the

relevant condition should be attached, with amendment for the lower figure stated in the Planning Authority letter to applicants of 13 January 2003, and employing a normal wording used by An Bord Pleanála.

Condition No. 19, (Saggart/Rathcoole/Newcastle Drainage Scheme)

The applicants accept the logic and amount of this proposed condition. However, consistent with the status which I have attributed to the Planning Authority's letter dated 13 January 2003 above, the amended figure of €51,802 should be applied in the event of such a condition being attached to any permission granted.

Condition No. 20 ("9b" Foul Drainage Catchment)

I accept the thrust of the applicants submission. This condition should not be attached, however such would not prevent the Planning Authority levying a contribution as proposed under the general heading of "works" referred to above, provided such works do facilitate the currently proposed development. There is insufficient information in the submissions on file for me to definitely decide whether or not "9b" is directly relevant to Greenogue.

RECOMMENDATION

Grant permission subject to conditions.

Draft Schedules are set out below.

REASONS AND CONSIDERATIONS

Having regard to the zoning provisions of the development plan for the area, the existing and emerging pattern of development in the vicinity and the site history, it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the residential amenities of the area or property in the vicinity, would be acceptable in terms of traffic safety and convenience and surface water drainage proposals. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

CONDITIONS

1. The development shall be carried out in accordance with the plans and particulars lodged with the application as amended by the drawings received by the planning authority on the 14 November 2002 except as may otherwise be required in order to comply with the following conditions.

Reason: In the interest of clarity.

2. The annual throughput of waste shall not exceed 62,500 tonnes save with a prior grant of planning permission.

Reason: To regulate and control the development, to safeguard the amenities of the area.

3. Water supply and drainage arrangements, including the disposal of surface water, shall comply with the requirements of the planning authority for such works and services.

Reason: In the interest of public health and to ensure a proper standard of development.

4. The site shall be landscaped in accordance with a scheme of landscaping, details of which shall be submitted to the planning authority for agreement before development commences. The scheme shall include inter alia:

- (a) an appropriate set back of development from the Griffeen River on the northern boundary of the site, the set-back area to include a grass margin and tarmacadam path all to the satisfaction of the Planning Authority;
- (b) retention of trees on the western site boundary, where practicable and
- (c) a timescale for the implementation of the scheme.

Reason: In the interest of visual amenity.

5. Prior to commencement of development, the developer shall submit for the written agreement of the Planning Authority, details of the colour, texture and materials for the external finishes of the proposed buildings, structures and surfaces.

Reason: In the interest of visual amenity.

6. The Integrated Waste Management Facility operation hours shall be restricted to 0730 to 1800 Monday to Friday and 0730 to 1400 on Saturdays. The facility will remain closed on Sundays, Bank Holidays and Public Holidays. An exception to the normal operation hours will only be allowed as set out below.

- (1) Deliveries may be accepted outside these operational times, subject to the condition that no loading, unloading, separation, breaking down of waste or other procedures will take place outside the normal operation hours. All waste brought to the site including that delivered outside normal operation hours shall be stored in accordance with EPA guidelines.
- (2) Deliveries to the Hydrocarbon Waste Division may be deposited to the designated primary settlement tanks within the facility.
- (3) Maintenance may be carried out outside the normal hours, all maintenance shall be carried out indoors.

Reason: In the interest of residential amenity.

7. During the operational phase of the proposed development, the noise level from within the premises, measured at noise sensitive locations in the vicinity, shall not exceed:-
 - (a) an L AeqT value of 55dB(A) during the period 0800 to 1800 hours from Monday to Saturday (inclusive), and
 - (b) an L AeqT value of 45dB(A) at any other time.

All sound measurements shall be carried out in accordance with ISO Recommendations R 1996, "Assessment of Noise with Respect to Community Response" as amended by ISO Recommendations R 1996/1, 2 and 3, "Description and Measurement of Environmental Noise", as appropriate.

Reason: To protect the amenities of properties in the vicinity of the site.

8. During the construction phase of the development, best practicable means shall be employed in the prevention and minimisation of air blown dust and noise. Heavy construction machinery and equipment shall not be operated outside the hours 0800 – 2000 hours Monday to Friday and 0800 – 1400 hours Saturdays.

Reason: In the interest of residential amenity.

9. Applicants shall comply with the requirements of the Department of Defence, having regard to the proximity of the appeal site to Baldonnell military airfield, in respect of building heights and management of potential wind-blown materials on site at any time.

Reason: In the interest of public safety.

10. On-site offices shall be ancillary to the main land-use as a waste management facility. There shall no sub-division, sale or letting, save with a prior grant of permission.

Reason: To regulate and control the development, to ensure a sustainable land use pattern in the area.

11. No advertisement or advertisement structure (other than exempted development structures) shall be erected or displayed within the curtilage of the site without a prior grant of planning permission.

Reason: In the interest of visual amenity.

12. Car parking spaces provided within the site shall be used for parking purposes only. Prior to commencement of development, the layout shall be submitted to the Planning Authority for agreement.

Reason: To ensure adequate off-street parking provision is available to serve the development.

13. Landscaped areas shall not be used for parking, storage or display purposes.

Reason: In the interest of visual amenity.

14. Prior to commencement of development, the developer shall lodge with the Planning Authority a cash deposit, a bond of an insurance company, or other security to secure the provision and satisfactory completion of roads, footpaths, watermains, drains, public open space and other services required in connection with the development, coupled with an agreement empowering the Planning Authority to apply such security or part thereof to the satisfactory completion of any part of the development. The form and amount of the security shall be as agreed between the Planning Authority and the developer or, in default of agreement, shall be determined by An Bord Pleanála.

15. The developer shall pay a sum of money to the planning authority as a contribution towards expenditure that was and/or that is proposed to be incurred by the planning authority in respect of works facilitating the proposed development. The amount of the contribution and the arrangements for payment shall be agreed between the developer and the planning authority or, in default of agreement, shall be determined by An Bord Pleanála.

In the case of expenditure that is proposed to be incurred, the requirement to pay this contribution is subject to the provisions of section 26(2)(h) of the Local Government (Planning and Development) Act, 1963 generally, and in particular, the specified period for the purposes of paragraph (h) shall be the period of seven years from the date of this order.

Reason: It is considered reasonable that the developer should contribute towards the expenditure that was and/or that is proposed to be incurred by the planning authority in respect of works facilitating the proposed development.

16. Prior to commencement of development, the developer shall pay the sum of €241,018 (updated at the time of payment in accordance with changes in the Wholesale Price Index - Building and Construction (Capital Goods), published by the Central Statistics Office), to the planning authority as a contribution towards expenditure that was and/or that is proposed to be incurred by the planning authority in respect of road works and improvements and traffic management (including any necessary traffic calming arrangements), facilitating the proposed development.

In the case of expenditure that is proposed to be incurred, the requirement to pay this contribution is subject to the provisions of section 26(2)(h) of the Local Government (Planning and Development) Act, 1963 generally, and in particular, the specified period for the purposes of paragraph (h) shall be the period of seven years from the date of this order.

Reason: It is considered reasonable that the developer should contribute towards the expenditure that was and/or that is proposed to be incurred by the planning authority in respect of works facilitating the proposed development.

17. Prior to commencement of development, the developer shall pay the sum of € 46,468 (updated at the time of payment in accordance with changes in the Wholesale Price Index - Building and Construction (Capital Goods), published by the Central Statistics Office), to the planning authority as a contribution towards expenditure that was and/or that is proposed to be incurred by the planning authority in respect of water supply works and improvements facilitating the proposed development.

In the case of expenditure that is proposed to be incurred, the requirement to pay this contribution is subject to the provisions of section 26(2)(h) of the Local Government (Planning and Development) Act, 1963 generally, and in particular, the specified period for the purposes of paragraph (h) shall be the period of seven years from the date of this order.

Reason: It is considered reasonable that the developer should contribute towards the expenditure that was and/or that is proposed to be incurred by the planning authority in respect of works facilitating the proposed development.

18. Prior to commencement of development, the developer shall pay the sum of € 22,420 (updated at the time of payment in accordance with changes in the Wholesale Price Index - Building and Construction (Capital Goods), published by the Central Statistics Office), to the planning authority as a contribution towards expenditure that was and/or that is proposed to be incurred by the planning authority in respect of Griffeen River Flood alleviation works facilitating the proposed development.

In the case of expenditure that is proposed to be incurred, the requirement to pay this contribution is subject to the provisions of section 26(2)(h) of the Local Government (Planning and Development) Act, 1963 generally, and in particular, the specified period for the purposes of paragraph (h) shall be the period of seven years from the date of this order.

Reason: It is considered reasonable that the developer should contribute towards the expenditure that was and/or that is proposed to be incurred by the planning authority in respect of works facilitating the proposed development.

19. Prior to commencement of development, the developer shall pay the sum of € 51,802 (updated at the time of payment in accordance with changes in the Wholesale Price Index - Building and Construction (Capital Goods), published by the Central Statistics Office), to the planning authority as a contribution towards expenditure that was and/or that is proposed to be incurred by the planning authority in respect of drainage works facilitating the proposed development.

In the case of expenditure that is proposed to be incurred, the requirement to pay this contribution is subject to the provisions of section 26(2)(h) of the Local Government (Planning and Development) Act, 1963 generally, and in particular, the specified period for the purposes of paragraph (h) shall be the period of seven years from the date of this order.

Reason: It is considered reasonable that the developer should contribute towards the expenditure that was and/or that is proposed to be incurred by the planning authority in respect of works facilitating the proposed development.

Keith Sargeant
Senior Planning Inspector
June 2003

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Headquarters
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County Wexford
Ireland

WASTE LICENCE

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Waste Licence Register Number:	192-1	*
Licensee:	Rilta Limited t/a Sita Environmental	*
Location of Facility:	Block 402, Greenogue Business Park, Rathcoole, County Dublin	*

INTRODUCTION

This introduction is not part of the licence and does not purport to be a legal interpretation of the licence.

This licence is for the operation of a hazardous waste treatment facility on a green field site at Greenogue Business Park, Rathcoole, County Dublin. The quantity of waste to be accepted at the facility is limited to 62,500 tonnes per annum consisting of hazardous waste, commercial waste, construction and demolition waste, industrial sludges and industrial waste.

The facility comprises of three components namely: drum recovery centre, hydrocarbon waste treatment centre and hazardous waste transfer station. At the drum recovery centre, nominally empty industrial packaging such as steel drums, plastic drums and intermediate bulk containers (IBC) will be reconditioned or recycled. The principal process at the hydrocarbon waste treatment centre will be treatment/recovery of hydrocarbon contaminated waste from such sources as bilge tanks of ships, petrol stations and oil spills. The hazardous waste transfer station will allow for bulking up and transfer of hazardous waste for recovery/disposal.

The licensee must manage and operate the facility to ensure that the activities do not cause environmental pollution. The licensee is required to carry out regular environmental monitoring and submit all monitoring results, and a wide range of reports on the operation and management of the facility to the Agency.

The licence sets out in detail the conditions under which Rilta Limited t/a Sita Environmental will operate and manage this facility.

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DECISION & REASONS FOR THE DECISION

On the basis of the information before it, the Environmental Protection Agency is satisfied that the waste activity, or activities, licensed hereunder in Part I will comply with the requirements of Section 40(4) of the Waste Management Acts 1996 to 2003.

In reaching this decision the Environmental Protection Agency has considered the application and supporting documentation received from the applicant, a submission received from a third party and the report of its inspector.

No objection having been received to the proposed decision, the licence is granted in accordance with the terms of the proposed decision and the reasons therefor.

INTERPRETATION

All terms in this licence should be interpreted in accordance with the definitions in the Waste Management Acts 1996 to 2003, (the Acts), unless otherwise defined in this section.

Adequate lighting	20 lux measured at ground level.
Aerosol	A suspension of solid or liquid particles in a gaseous medium.
Agreement	Agreement in writing.
Annually	At approximately twelve monthly intervals.
Attachment	Any reference to Attachments in this licence refers to attachments submitted as part of the waste licence application.
Application	The application by the licensee for this waste licence.
Appropriate facility	A waste management facility, duly authorised under relevant law and technically suitable.
BAT	Best Available Techniques.
Bi-annually	All or part of a period of six consecutive months.
Biodegradable waste	Any waste that is capable of undergoing anaerobic or aerobic decomposition, such as food, garden waste, sewage sludge, paper and paperboard.
Condition	A condition of this licence.
Consignment Note	All movements of hazardous waste within Ireland must be accompanied by a "C1" consignment note issued by a local authority under the Waste Management (Movement of Hazardous Waste) Regulations (SI No. 147 of 1998
Construction and Demolition Waste	All wastes which arise from construction, renovation and demolition activities.
Containment boom	A boom which can contain spillages and prevent them from entering drains or watercourses.
Daytime	8.00 a.m. to 10.00 p.m.
Documentation	Any report, record, result, data, drawing, proposal, interpretation or other document in written or electronic form which is required by this licence.

Drawing	Any reference to a drawing or drawing number means a drawing or drawing number contained in the application, unless otherwise specified in this licence.
Emergency	Those occurrences defined in Condition 9.4.
Emission Limits	Those limits, including concentration limits and deposition levels established in <i>Schedule C: Emission Limits</i> , of this licence.
European Waste Catalogue (EWC)	A harmonised, non-exhaustive list of wastes drawn up by the European Commission and published as Commission Decision 2000/532/EC and any subsequent amendment published in the Official Journal of the European Community.
Green waste	Waste wood (excluding timber), plant matter such as grass cuttings, and other vegetation.
Hours of Operation	The hours during which the facility is authorised to be operational
Hours of Waste Acceptance	The hours during which the facility is authorised to accept waste
Incident	The following shall constitute an incident for the purposes of this licence: <ul style="list-style-type: none"> a) an emergency; b) any emission which does not comply with the requirements of this licence; c) any exceedence of the daily duty capacity of the waste handling equipment; d) any trigger level specified in this licence which is attained or exceeded; and, e) any indication that environmental pollution has, or may have, taken place
Industrial Waste	As defined in Section 5(1) of the Act.
Inert waste	Waste as so defined in S.I. No. 395 of 2004 Waste Management (Licensing) Regulations, 2004.
Landfill Directive	Council Directive 1999/31/EC.
Licence	A Waste Licence issued in accordance with the Acts.
Licensee	Rilta Limited t/a Sita Environmental.
Liquid Waste	Any waste in liquid form and containing less than 2% dry matter. Any waste tankered to the facility.
Maintain	Keep in a fit state, including such regular inspection, servicing, calibration and repair as may be necessary to adequately perform its function.
Mobile Plant	Self-propelled machinery used for the emplacement of wastes or for the construction of specified engineering works.
Monthly	A minimum of 12 times per year, at approximately monthly intervals.
Municipal waste	As defined in Section 5(1) of the Act.
Night-time	10.00 p.m. to 8.00 a.m.

Noise Sensitive Location (NSL)	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Oil Separator	Device installed according to the draft European Standard prEN 858 (Installations for the separation of light liquids, e.g. oil and petrol).
Recyclable Materials	Those waste types, such as cardboard, batteries, gas cylinders, etc, which may be recycled.
Quarterly	At approximately three monthly intervals.
Sanitary Authority	South Dublin County Council.
Sample(s)	Unless the context of this licence indicates to the contrary, samples shall include measurements by electronic instruments.
SOP	Standard Operating Procedure.
Specified Emissions	Those emissions listed in <i>Schedule C: Emission Limits</i> of this licence.
Specified Engineering Works (SEW)	Those engineering works listed in <i>Schedule B: Specified Engineering Works</i> of this licence.
TOC	Total Organic Carbon.
Transfrontier Shipment Notification	Transfrontier Shipment Notification and movement/tracking form numbers are required for all exports of waste from, into or through the State under the Waste Management (Transfrontier Shipment of Waste) Regulations (S.I. No. 149 of 1998).
Trigger Level	A parameter value specified in the licence, the achievement or exceedance of which requires certain actions to be taken by the licensee.
Wastewater	Contaminated water including water that has been used, for washing, and/or flushing (including foul water).
Weekly	During all weeks of plant operation, and in the case of emissions, when emissions are taking place; with no more than one measurement in any one week.
White Goods	Refrigerators, cookers, ovens and other similar appliances.
EPA Working Day	Refers to the following hours; 9.00 a.m. to 5.30 p.m. Monday to Friday inclusive.

Part I Schedule of Activities Licensed

In pursuance of the powers conferred on it by the Waste Management Acts 1996 to 2003, the Environmental Protection Agency (the Agency), under Section 40(1) of the said Acts hereby grants this Waste Licence to Rilta Limited t/a Sita Environmental to carry on the waste activities listed below at Block 402, Greenogue Business Park, Rathcoole, Co. Dublin subject to conditions, with the reasons therefor and the associated schedules attached thereto set out in the licence.

Licensed Waste Disposal Activities, in accordance with the Third Schedule of the Waste Management Acts 1996 to 2003

Class 7.	Physico-chemical treatment not referred to elsewhere in this Schedule (including evaporation, drying and calcination) which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1. 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 to any activity referred to in a 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 is produced.

Licensed Waste Recovery Activities, in accordance with the Fourth Schedule of the Waste Management Acts 1996 to 2003

Class 2.	Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).
Class 3.	Recycling or reclamation of metals and metal compounds.
Class 4.	Recycling or reclamation of other inorganic materials.
Class 6.	Recovery of components used for pollution abatement.
Class 8.	Oil re-refining or other re-uses of oil.
Class 13.	Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced.

Part II: Schedule of Activities Refused

On the basis of the information before it, the Environmental Protection Agency (the Agency), pursuant to its powers under Section 40(1) of the Waste Management Acts 1996 to 2003, hereby refuses the following class of activity.

Refused waste disposal activities, in accordance with the Third Schedule of the Waste Management Acts 1996 to 2003

Class 4.	Surface impoundment, including placement of liquid or sludge discards into pits, ponds or lagoons. Reason: The storage of waste oil/water mixtures in settlement tanks on-site and temporary storage of settled sludge and flocculated solids from the water treatment stage does not constitute a Class 4 Activity. This activity as described in the application is more appropriate to and acceptable under Class 7 and Class 13 of the Third Schedule.
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PART III CONDITIONS

CONDITION 1 SCOPE OF THE LICENCE

- 1.1 Waste activities at the facility shall be restricted to those outlined in the licence application and listed and described in Part I: Activities Licensed and authorised by this licence subject to the conditions of this licence.
- 1.2 For the purposes of this licence, the facility is the area of land outlined in red on Drawing No. 1102/02/301 *Site Location* of the application. Any reference in this licence to “facility” shall mean this area outlined in red.
- 1.3 This licence is for the purposes of waste licensing under the Waste Management Acts 1996 to 2003 only and nothing in this licence shall be construed as negating the licensee’s statutory obligations or requirements under any other enactments or regulations.
- 1.4 Only those waste categories and quantities listed in *Schedule A: Waste Acceptance* of this licence, shall be accepted at the facility.
- 1.5 Every plan, programme or proposal submitted to the Agency for its agreement pursuant to any Condition of this licence shall include a proposed timescale for its implementation. The Agency may modify or alter any such plan, programme or proposal in so far as it considers such modification or alteration to be necessary and shall notify the licensee in writing of any such modification or alteration. Every such plan, programme or proposal shall be carried out within the timescale fixed by the Agency but shall not be undertaken without the agreement of the Agency. Every such plan, programme or proposal agreed by the Agency shall be covered by the conditions of this licence.

REASON: *To clarify the scope of this licence.*

CONDITION 2 MANAGEMENT OF THE FACILITY

- 2.1 Facility Management
 - 2.1.1 The licensee shall employ a suitably qualified and experienced facility manager who shall be designated as the person in charge. The facility manager or a nominated, suitably qualified and experienced, deputy shall be present on the facility at all times during its operation.
 - 2.1.2 Both the facility manager and deputy, and any replacement manager or deputy, shall successfully complete both the FAS waste management training programme (or equivalent agreed by the Agency) and associated on site assessment appraisal within twelve months of appointment.
 - 2.1.3 The licensee shall ensure that personnel performing specifically assigned tasks shall be qualified on the basis of appropriate education, training and experience, as required and shall be aware of the requirements of this licence.
- 2.2 Management Structure
 - 2.2.1 Prior to the commencement of waste activities, the licensee shall submit written details of the management structure of the facility to the Agency. Any proposed replacement

in the management structure shall be notified in advance in writing to the Agency. Written details of the management structure shall include the following information.

- a) the names of all persons who are to provide the management and supervision of the waste activities authorised by the licence, in particular the name of the facility manager and any nominated deputies;
- b) details of the responsibilities for each individual named under a) above; and
- c) details of the relevant education, training and experience held by each of the persons nominated under a) above.

2.3 Environmental Management System (EMS)

2.3.1 The licensee shall establish and maintain an EMS. Within three months from the date of grant of this licence, the licensee shall submit to the Agency for its agreement a proposal for a documented Environmental Management System (EMS) for the facility. Following the agreement of the Agency, the licensee shall establish and maintain such a system. The EMS shall be updated on an annual basis with amendments being submitted to the Agency for its agreement as part of the AER.

2.3.2 The EMS shall include as a minimum the following elements:

2.3.2.1 Schedule of Environmental Objectives and Targets

The objectives should be specific and the targets measurable. The Schedule shall address a five-year period as a minimum. The Schedule shall include a time-scale for achieving the objectives and targets and shall comply with any other written guidance issued by the Agency.

2.3.2.2 Environmental Management Plan (EMP)

The EMP shall include, as a minimum, the following:

- (i) methods by which the objectives and targets will be achieved in the coming year and the designation of responsibility for targets;
- (ii) any other items required by written guidance issued by the Agency.

2.3.2.3 Corrective Action Procedures

The Corrective Action Procedures shall detail the corrective actions to be taken should any of the procedures detailed in the EMS not be followed.

2.3.2.4 Awareness and Training Programme

The Awareness and Training Programme shall identify training needs, for personnel who work in or have responsibility for the licensed facility.

2.4 Communications Programme

2.4.1 The licensee shall establish and maintain a Communications Programme to ensure that members of the public can obtain information at the facility, at all reasonable times, concerning the environmental performance of the facility. This shall be established within six months of the date of grant of this licence.

REASON: *To make provision for the proper management of the activity on a planned basis having regard to the desirability of ongoing assessment, recording and reporting of matters affecting the environment.*

CONDITION 3 FACILITY INFRASTRUCTURE

3.1 The licensee shall establish all infrastructure referred to in this licence prior to the commencement of the licensed activities or as required by the conditions of this licence.

3.2 Specified Engineering Works

3.2.1 The licensee shall submit proposals for all Specified Engineering Works, as defined in *Schedule B: Specified Engineering Works* of this licence, to the Agency for its agreement at least two months prior to the intended date of commencement of any such works. No such works shall be carried out without the prior agreement of the Agency.

3.2.2 All specified engineering works shall be supervised by a competent person(s) and that person, or persons, shall be present at all times during which relevant works are being undertaken.

3.2.3 Following the completion of all specified engineering works, the licensee shall complete a construction quality assurance validation. The validation report shall be made available to the Agency on request. The report shall include as may be appropriate the following information:-

- a) a description of the works;
- b) as-built drawings of the works;
- c) records and results of all tests carried out (including failures);
- d) drawings and sections showing the location of all samples and tests carried out;
- e) daily record sheets/diary;
- f) name(s) of contractor(s) and individual(s) responsible for undertaking the specified engineering works;
- g) name(s) of individual(s) responsible for supervision of works and for quality assurance validation of works;
- h) records of any problems and the remedial works carried out to resolve those problems; and
- i) any other information requested in writing by the Agency.

3.3 Facility Notice Board

3.3.1 The licensee shall provide and maintain a Facility Notice Board on the facility so that it is legible to persons outside the main entrance to the facility. The minimum dimensions of the board shall be 1200 mm by 750 mm.

3.3.2 The board shall clearly show:-

- a) the name and telephone number of the facility;
- b) the normal hours of opening;
- c) the name of the licence holder;
- d) an emergency out of hours contact telephone number;
- e) the licence reference number; and
- f) where environmental information relating to the facility can be obtained.

3.4 Facility Security

3.4.1 Prior to commencement of waste acceptance at the facility, security and stockproof fencing and gates shall be installed and maintained as described in Section 3.5.2 *Security and Entry Control Facilities* of the EIS submitted with the application, unless

otherwise agreed by the Agency. The security fence and gates shall be at the locations shown on Drawing No. 1102/02/305 *Site Layout Plan*. The base of the fencing shall be set in the ground.

3.4.2 The licensee shall remedy any defect in the gates and/or fencing as follows:-

- a) a temporary repair shall be made by the end of the working day; and
- b) a repair to the standard of the original gates and/or fencing shall be undertaken within three working days.

3.4.3 Gates shall be locked shut when the facility is unsupervised.

3.4.4 There shall be no casual public access to the facility.

3.5 Facility Roads and Site Surfaces

3.5.1 Effective site roads shall be provided and maintained to ensure the safe movement of vehicles within the facility.

3.5.2 Prior to commencement of waste acceptance at the facility, the licensee shall provide, and maintain an impermeable concrete surface in all areas of the facility, the surfaces shall be concreted and constructed to British Standard 8110 or an alternative as agreed by the Agency.

3.5.3 Traffic layout at the facility shall be such that emergency services' vehicles shall have access to all parts of the facility at all times.

3.6 Facility Office

3.6.1 The licensee shall provide and maintain an office at the facility. The office shall be constructed and maintained in a manner suitable for the processing and storing of documentation.

3.6.2 The licensee shall provide and maintain a working telephone and a method for electronic transfer of information at the facility.

3.7 Waste Inspection and Quarantine Areas

3.7.1 Prior to commencement of waste acceptance at the facility, Waste Inspection Area(s) and separate Waste Quarantine Area(s) shall be provided and maintained at the facility.

3.7.2 These areas shall be constructed and maintained in a manner suitable, and be of a size appropriate, for the inspection of waste and subsequent quarantine if required. The waste inspection area(s) and the waste quarantine area(s) shall be clearly identified and segregated from each other.

3.7.3 The waste quarantine area(s) shall be secured, bunded and surfaced to deal with spillages.

3.8 Weighbridge and Vehicle Wash Area

3.8.1 Prior to commencement of waste acceptance at the facility, the licensee shall provide and maintain weighbridge(s) and a vehicle wash area at the facility.

3.8.2 The vehicle wash area shall be used by all vehicles leaving the facility as required to ensure that no wastewater or waste is carried off-site. All water from the vehicle wash area shall be directed to the wastewater drainage system.

3.9 Waste handling, ventilation and processing plant

3.9.1 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:-

- a) 100% duty capacity;
- b) 20% standby capacity available on a routine basis; and
- c) Provision of contingency arrangements and/or back up and spares in the case of breakdown of critical equipment.

3.9.2 Prior to the commencement of waste activities, the licensee shall provide a report for the agreement of the Agency detailing the duty and standby capacity in tonnes per day, of all waste handling and processing equipment to be used at the facility. These capacities shall be based on the licensed waste intake, as per *Schedule A: Waste Acceptance*, of this licence.

3.9.3 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. Any exceedance of this intake shall be treated as an incident.

3.10 Hazardous Waste Storage Areas and Tank and Drum Storage Areas

3.10.1 All tank, drum and hazardous waste storage areas shall be rendered impervious to the materials stored therein.

3.10.2 All tank, drum and hazardous waste storage areas shall, as a minimum, be bunded, either locally or remotely, to a volume not less than the greater of the following:-

- a) 110% of the capacity of the largest tank or drum within the bunded area; or
- b) 25% of the total volume of substance which could be stored within the bunded area.

3.10.3 Daily visual inspection shall be carried out at all bunded areas to detect any possible spillages. Weekly visual inspections shall be carried out to assess all bunds and hardstanding areas for structural soundness and cracking/damage.

3.10.4 All spillages shall be treated as hazardous waste unless they are known to be otherwise. All drainage from bunded areas shall be diverted for collection and safe disposal.

3.10.5 Each bunded area shall be clearly labelled so that it is legible to persons outside the bunded area. The labelling shall clearly indicate the material class type stored in that area and the maximum quantity of material that can be stored therein. The management and arrangements of the bunded areas shall ensure that no mixing of incompatible substances, as a result of spillages or otherwise, shall take place.

3.10.6 All inlets, outlets, vent pipes, valves and gauges must be within the bunded area.

3.10.7 The integrity and water tightness of all the bunds and their resistance to penetration by water or other materials stored therein shall be confirmed by the licensee and shall be reported to the Agency following its installation and prior to its use as a storage area. This confirmation shall be repeated at least once every three years thereafter and reported to the Agency on each occasion.

3.11 Underground Settlement Tanks

3.11.1 Prior to waste acceptance at the Hydrocarbon Waste Treatment Centre, a secondary containment system with leak detection shall be installed for the underground settlement tanks shown on Drawing No. GA-05 Rev. L *Foundation/Ground FL GA Hydrocarbon*

Waste Treatment Centre of the Article 16 reply received on 10/05/04. Installation shall be in accordance with *Installation, Decommissioning and Removal of Underground Storage Tanks*, PPG 27 EA.

- 3.11.2 The licensee shall complete a construction quality assurance validation for the above works as specified in Condition 3.2.3 including a certificate confirming that the tanks comply with BS EN 12285-1:2003 or equivalent.
- 3.12 Decant Room & Photographic Waste Processing Plant (PWPP) (Hazardous Waste Transfer Station).
- 3.12.1 Details of the decant room and PWPP must be agreed in advance by the Agency as part of SEW. The proposal must include and address the following as a minimum:
- a) Bunding arrangements
 - b) Drainage arrangements
 - c) Air emissions
 - d) Noise emissions
 - e) Process control equipment
 - f) Back-up, maintenance and calibration requirements
 - g) Abatement equipment
 - h) Periods of emission
 - i) Volumes to be emitted
 - j) Stack characteristics including vent diameter and height above ground level
 - k) Assessment of compliance with Condition 11.1.
- 3.12.2 A noise prediction model shall be submitted to the Agency as part of the proposal to install and operate the decant room and PWPP.
- 3.12.3 An air emissions model shall be submitted to the Agency as part of the proposal to install and operate the decant room and PWPP.
- 3.12.4 Monitoring locations, frequency of monitoring, emission limit values, methods of analysis and monitoring parameters shall be agreed in advance by the Agency prior to the operation of the decant room and PWPP.
- 3.13 Drainage system, pipeline testing
- 3.13.1 Prior to commencement of waste acceptance, the wastewater drainage system shall be installed as described in Section D.1.I *Sewerage and Surface Water Drainage Infrastructure* and shown on Drawing No. D1 *Drainage Layout* and specified on Drawing No. GA-07 *Foundation/Ground FL GA Drum Recycling Centre*, Drawing No. GA-01 *Foundation/Ground FL GA Hazardous Waste Transfer Station* and Drawing No. GA-05 *Foundation/Ground FL GA Hydrocarbon Waste Treatment Centre* submitted as part of the Article 16 reply received on 10/05/04, unless otherwise agreed by the Agency.
- 3.13.2 In the Drum Recovery Centre and the Hazardous Waste Transfer Station, a manual shut-off valve shall be installed on the wastewater drainage network prior to discharge to the sewer. The shut-off valve shall be maintained in the closed position.

- 3.13.3 Surface water run-off from the vehicle wash area and the weighbridge area shall be discharged to the wastewater drainage system.
- 3.13.4 Surface water run-off from all areas other than the weighbridge area and the vehicle wash area shall be discharged to the surface water run-off drainage system.
- 3.13.5 The licensee shall install and maintain silt traps and oil interceptors at the facility to ensure that all surface water run-off and wastewater (excluding toilet and canteen wastewater) discharges from the facility pass through a silt trap and oil interceptor prior to discharge. For discharges to surface water, the interceptors shall be a Class I full retention interceptor which shall be fitted with a manual shut-off valve. For discharges to sewer, the interceptors shall be Class II full retention interceptor. The silt traps and interceptors shall be in accordance with European Standard prEN 858 (installations for the separation of light liquids).
- 3.13.6 The licensee shall submit a drawing to the Agency within six months of the date of grant of this licence, indicating all drainage arrangements at the site as detailed in this licence.
- 3.13.7 Prior to the commencement of waste activities, all foul sewer gullies, drainage grids and manhole covers shall be painted with red squares whilst all surface water discharge gullies, drainage grids and manhole covers shall be painted with blue triangles. These colour codes shall be maintained so as to be visible at all times during facility operation, and any identification designated in this licence (e.g. SW1) shall be inscribed on these manholes.
- 3.13.8 The drainage system, bunds, silt traps and oil separators shall be inspected weekly, desludged as necessary and properly maintained at all times. All sludge and drainage from these operations shall be collected for safe disposal. A written record shall be kept of the inspections, desludging, cleaning, disposal of associated waste products, maintenance and performance of the interceptors, bunds and drains.
- 3.13.9 The integrity and watertightness of all underground pipes and tanks and their resistance to penetration by water or other materials carried or stored therein shall be tested and demonstrated by the licensee and shall be reported to the Agency following their installation and prior to their use. This testing shall be carried out by the licensee at least once every three years thereafter and reported to the Agency on each occasion. A written record of all integrity tests and any maintenance or remedial work arising from them shall be maintained by the licensee.

3.14 Monitoring Infrastructure

3.14.1 Groundwater

- (i) All wellheads shall be adequately sealed to prevent surface contamination within six months from the date of grant of this licence.
- (ii) Groundwater monitoring wells shall be constructed having regard to the guidance given in the Agency's landfill manual "Landfill Monitoring".

3.14.2 Replacement of Infrastructure

- (i) Monitoring infrastructure which is damaged or proves to be unsuitable for its purpose shall be replaced within three months of it being damaged or recognised as being unsuitable.

REASON: *To provide appropriate infrastructure for the protection of the environment.*

CONDITION 4 RESTORATION AND AFTERCARE

- 4.1. Decommissioning and Aftercare of the facility shall be carried out to an agreed plan and to an agreed standard sufficient to return the site to a satisfactory state. A proposal for a Decommissioning and Aftercare Plan for the facility shall be submitted prior to commencement of waste acceptance at the facility. The licensee shall update decommissioning and closure plans when required by the Agency.

REASON: To provide for the restoration of the facility.

CONDITION 5 FACILITY OPERATIONS

- 5.1 All waste processing shall be carried out inside the Drum Recovery Centre, the Hydrocarbon Waste Treatment Centre or the Hazardous Waste Transfer Station.
- 5.2 Waste Acceptance and Characterisation Procedures
- 5.2.1 Waste shall only be accepted at the facility, from Local Authority waste collection or transport vehicles or holders of waste permits, unless exempted or excluded, issued under the Waste Management (Collection Permit) Regulations 2001. Copies of these waste collection permits must be maintained at the facility.
- 5.2.2 Prior to commencement of waste acceptance at the facility, the licensee shall establish and maintain detailed written procedures and criteria for the acceptance, handling, sampling and bulking of all wastes to include decontamination, labelling, compatibility testing, analysis, weighing, documentation, transfer, storage and record keeping.
- 5.2.3 Hazardous wastes that are accepted at the facility as per *Schedule A: Waste Acceptance*, of this licence and fuels shall only be stored at appropriately banded locations at the facility.
- 5.2.4 All waste accepted at the facility shall fulfil the waste acceptance criteria as required by Condition 5.2.2.
- 5.2.5 No hazardous waste may be accepted at the Hazardous Waste Transfer Station unless:
- The licensee has been notified in advance of the types of waste (including EWC Codes) and the date of delivery;
 - The waste has been appropriately labelled using the relevant EWC Codes;
 - An effective procedure for accepting and handling the waste is in place and satisfactory staff training in the implementation of that procedure has been undertaken;
 - The waste has been classified in accordance with the UN publication "*Recommendations on the Transport of Hazardous Goods: Model Regulations*" as amended and fully characterised. Where necessary, and particularly in the case of new customers or waste types, its characteristics and hazardous properties have been confirmed by the licensee by sampling and analysis in advance of arrival at the facility;
 - A suitable designated storage area is immediately available at the Hazardous Waste Transfer Station; and

- f) A designated waste quarantine area is immediately available at the facility for any waste which does not conform with the pre-notification and which cannot be otherwise accepted at the facility.
- 5.2.6 Each load of waste arriving at the facility shall be inspected at the point of entry to the facility and subject to this inspection, weighed, documented and directed to the Drum Recovery Centre, Hydrocarbon Waste Treatment Centre or Hazardous Waste Transfer Station. Only after such inspections shall the waste be processed for disposal or recovery.
- 5.2.7 Any waste deemed unsuitable for processing at the facility and/or in contravention of this licence shall be immediately separated and removed from the facility at the earliest possible time. Temporary storage of such wastes shall be in a designated Waste Quarantine Area. Waste shall be stored under appropriate conditions in the quarantine area to avoid putrefaction, odour generation, the attraction of vermin and any other nuisance or objectionable condition.
- 5.2.8 A record of all inspections of incoming waste loads shall be maintained.
- 5.2.9 Waste shall be accepted at the facility only from known customers or new customers subject to initial waste profiling and waste characterisation off-site. The written records of this off-site waste profiling and characterisation shall be retained by the licensee for all active customers and for a two year period following termination of licensee/customer agreements.
- 5.2.10 Prior to the acceptance of any waste at the facility, the licensee shall submit to the Agency for its agreement a site-specific tracking system to cater for all materials being accepted at the facility. Any modifications to the tracking system shall be agreed in advance with the Agency.
- 5.3 Labelling of containers, drums and tanks.
- 5.3.1 No container (including drums and tanks) shall be accepted at the facility whose contents are unknown and whose contents are not clearly displayed on a label.
- 5.3.2 All containers including waste and fuel storage tanks and drums shall be labelled to clearly indicate their contents. During storage, each container shall be accessible and shall be so placed to allow for the reading of the label.
- 5.3.3 All hazardous waste containers shall be uniquely marked with an identification code using indelible or other permanent or electronic markings. All containers shall be marked or labelled to clearly indicate their contents. All previous markings and labels shall be defaced or crossed out.
- 5.4 Operational Controls
- 5.4.1 No waste shall have a retention time at the facility in excess of six months, unless otherwise agreed by the Agency.
- 5.4.2 The floor of the Drum Recovery Centre, Hydrocarbon Waste Treatment Centre and Hazardous waste transfer building shall be washed down and cleared of all waste on a regular basis or at such intervals as agreed by the Agency.
- 5.4.3 Scavenging shall not be permitted at the facility.
- 5.4.4 The licensee shall provide and use adequate lighting during the operation of the facility in hours of darkness.
- 5.4.5 The licensee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive wastes. The waste shall be separated and protected from sources

of ignition or reaction including but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical or mechanical), spontaneous ignition (e.g. heat-producing chemical reactions) and radiant heat.

5.5 Waste Repackaging

5.5.1 All containers accepted at the facility shall be whole and sound. Any leaking or otherwise ruptured drums or containers shall immediately be overdrummed or the contents transferred to a sound container in a manner which will not adversely affect the environment. This operation shall only be carried out in banded areas such that any spillage arising from the activity may be contained and collected.

5.5.2 All operations involving the transfer of contents referred to in Condition 5.5.1 shall take place indoors, protected against spillage, in a designated area to be agreed with the Agency. Appropriate control measures shall be put in place to minimise any emissions which may arise from such activity.

5.6 Waste and Chemical Storage Tracking System

5.6.1 Within two months from the date of grant of the licence, an electronic waste and chemical storage tracking system shall be established and maintained.

5.6.2 The waste storage tracking system shall illustrate the location, identification code, volume and content of all waste containers held at the facility. The chemical storage tracking system shall illustrate the location, volume and content of all chemical containers whose volume exceeds 25 litres held at the facility.

5.6.3 The waste and chemical storage tracking system shall be updated daily by the end of each working day and shall be verified as updated by an authorised person or a nominated deputy as identified under Condition 2.1.1.

5.7 Blending/Mixing/Bulking of hazardous wastes

5.7.1 No blending, mixing or bulking up shall be carried out at the Hazardous Waste Transfer Building prior to approval from the Agency. Blending, mixing or bulking up of hazardous solid or liquid waste shall only be carried out in the decant room.

5.7.2 The compatibility of wastes to be bulked-up shall be established prior to such bulking-up taking place. The procedures to be in place under Condition 5.2.2 shall consider any compatibility testing that may be required, including, as far as is possible, the identification of any potentially abnormal or unusual situations.

5.7.3 Records shall be maintained of all compatibility tests carried out.

5.8 Processing of Photographic Waste

5.8.1 No photographic waste shall be processed at the facility prior to approval from the Agency. Processing of photographic waste shall only be carried out in the Hazardous Waste Transfer Station.

5.9 Processing of hydrocarbon waste

5.9.1 The processing of hydrocarbon waste at the Hydrocarbon Waste Treatment Centre shall be carried out as described in Section 3.3.2 *Hydrocarbon Waste Treatment Centre* of the EIS submitted with the application and shown on Fig. 3.3 *Hydrocarbon Waste Treatment Centre Process Flow Diagram* submitted as part of the Article 16 reply received 10/5/04, unless otherwise agreed by the Agency.

5.9.2 The heating of waste oils will be carried out at the appropriate temperature so as to avoid their combustion. A safety cut off temperature detection unit shall be installed on

the oil heating tanks and calibrated annually. A calibration certificate shall be submitted as part of the AER.

5.10 Off-site Disposal and Recovery

5.10.1 All waste transferred from the facility shall be transferred by an authorised or exempted carrier, and only to an appropriate facility agreed by the Agency. Any request for agreement of such a facility shall be forwarded to the Agency at least two weeks in advance of its proposed use and shall include the following:

- (i) A copy of the waste permit or waste licence where applicable.
- (ii) The waste types and quantities.

5.11 Wastewater Management

5.11.1 Wastewater treatment at the Hydrocarbon Waste Treatment Centre shall be carried out as described in Section 3.3.2 *Hydrocarbon Waste Treatment Centre* of the EIS submitted with the application, unless otherwise agreed by the Agency.

5.11.2 Discharge of wastewater from the Hydrocarbon Waste Treatment Centre to the wastewater drainage network shall cease in the event of breakdown of the on-site wastewater treatment system and the wastewater shall be tankered off-site in fully enclosed road tankers to an agreed Wastewater Treatment Plant or other authorised facility to be agreed by the Agency and disposed of there.

5.11.3 Wastewater stored in the on-site storage tanks and/or wastewater unsuitable for discharge to sewer shall be tankered off-site in fully enclosed road tankers to an authorised facility to be agreed by the Agency and disposed of there.

5.12 Maintenance

5.12.1 All treatment/abatement and emission control equipment shall be calibrated and maintained, in accordance with the instructions issued by the manufacturer/supplier or installer. Written records of the calibrations and maintenance shall be made and kept by the licensee.

5.12.2 The vehicle wash shall be inspected on a daily basis and drained as required. Silt, stones and other accumulated material shall be removed as required from the wheel-wash and disposed of appropriately.

5.12.3 The licensee shall maintain all waste processing equipment and infrastructure in accordance with the manufacturers instructions.

5.13 Resource Use and Energy Efficiency

5.13.1 The licensee shall carry out an audit of the energy efficiency of the site within one year of the date of grant of this licence. The licensee shall consult with the Agency on the nature and extent of the audit and shall develop an audit programme to the satisfaction of the Agency. The audit programme shall be submitted to the Agency in writing at least one month before the audit is to be carried out. A copy of the audit report shall be available on-site for inspection by authorised persons of the Agency and a summary of the audit findings shall be submitted as part of the Annual Environmental Report. The energy efficiency audit shall be repeated at intervals as required by the Agency.

5.13.2 The audit shall identify all opportunities for energy use reduction and efficiency and the recommendations of the audit will be incorporated into the Schedule of Environmental Objectives and Targets under Condition 2 above.

- 5.13.3 The licensee shall identify opportunities for reduction in the quantity of water used on site including recycling and reuse initiatives, wherever possible. Reductions in water usage shall be incorporated into Schedule of Environmental Objectives and Targets.
- 5.13.4 The licensee shall undertake an assessment of the efficiency of use of raw materials in all processes, having particular regard to the reduction in waste generated. The assessment should take account of best international practice for this type of activity.. Where improvements are identified, these shall be incorporated into the Schedule of Environmental Objectives and Targets.

REASON: To provide for appropriate operation of the facility to ensure protection of the environment.

CONDITION 6 EMISSIONS

- 6.1. No specified emission from the facility shall exceed the emission limit values set out in *Schedule C: Emission Limits* of this licence. There shall be no other emissions of environmental significance.
- 6.2. The licensee shall ensure that the activities shall be carried out in a manner such that emissions do not result in significant impairment of, or significant interference with the environment beyond the facility boundary.
- 6.3. Emissions to Atmosphere
- 6.3.1. Emission limits for emissions to atmosphere in this licence shall be interpreted in the following way.
- 6.3.1.1. Non-Continuous Monitoring
- (i) For any parameter where, due to sampling/analytical limitations, a 30 minute sample is inappropriate, a suitable sampling period should be employed and the value obtained therein shall not exceed the emission limit value.
 - (ii) For all other parameters, no 30 minute mean value shall exceed the emission limit value.
 - (iii) For flow, no hourly or daily mean value shall exceed the emission limit value.
 - (iv) Mass flow thresholds refer to a rate of discharge expressed in units of kg/h, above which the concentration emission limit value applies. Mass flow threshold rates shall be determined on the basis of a single 30 minute measurement (i.e. the concentration determined as a 30 minute average shall be multiplied by an appropriate measurement of flow and the result shall be expressed in units of kg/h).
 - (v) Mass flow shall be calculated on the basis of the concentration, determined as an average over the specified period, multiplied by an appropriate measurement of flow. No value, so determined, shall exceed the mass flow limit value.
 - (vi) At emission points A2 and A3, and where annual solvent usage is greater than 5 tonnes, the average of all the readings shall not exceed the emission limit value and no hourly average value shall exceed 1.5 times the emission limit.

At least three readings shall be obtained in each monitoring exercise.

- 6.3.2 The concentration limits for emission to atmosphere specified in this licence shall be achieved without the introduction of dilution air and shall be based on gas volumes under standard conditions of:

Temperature 273K, pressure 101.3kPa (no correction for oxygen or water content).

- 6.3.3 Emissions to atmosphere shall only be made at locations A1, A2 and A3 as illustrated on Drawing No. 1102/02/334 *Additional Monitoring Points* submitted as part of the Article 14 reply received 24/12/03, unless otherwise agreed by the Agency.
- 6.3.4 Fugitive emissions to air of volatile organic compounds shall not exceed the following limits:
- (i) 20% of total solvent input where solvent consumption is greater than 15 tonnes per year.
 - (ii) 25% of total solvent input where solvent consumption is less than 15 tonnes per year.
- 6.3.5 The licensee shall prepare a solvent management plan (SMP) in accordance with any relevant guidelines in Schedule 6 of S.I. No. 543 of 2002 (Emissions of VOCs from Organic Solvent Regulations 2002) or as may be issued by the Agency from time to time. The solvent management plan shall be used to demonstrate compliance with the fugitive emission limit value. The SMP shall be submitted as part of the AER.

6.4. Emissions to Surface Water

- 6.4.1. No wastewater and/or contaminated surface water run-off shall be discharged to surface water drains and courses.
- 6.4.2. No substance shall be discharged in a manner, or at a concentration which, following initial dilution causes tainting of fish or shellfish.

6.5. There shall be no direct emissions to groundwater.

6.6. There shall be no clearly audible tonal component or impulsive component in the noise emissions from the activity at the noise sensitive locations.

6.7. Emissions to Sewer.

- 6.7.1. Unless otherwise agreed in advance by the Agency and the Sanitary Authority, the following shall apply for the discharge of wastewater and contaminated surface water run-off. There shall be no other discharge or emission to sewer of environmental significance.
- 6.7.1.1. No material from the drains in the Drum Recovery Centre and the Hazardous Waste Transfer Station shall be discharged to the foul sewer without the consent of the Agency and Sanitary Authority.
 - 6.7.1.2. No substance shall be present in emissions to sewer in such concentrations as would constitute a danger to sewer maintenance personnel working in the sewerage system, or as would be damaging to the fabric of the sewer, or as would interfere with the biological functioning of a downstream wastewater treatment works.
 - 6.7.1.3. The wastewater and contaminated surface water run-off discharged to sewer shall be screened prior to discharge to remove gross solids and avoid blockages in the sewer.

- 6.7.1.4. 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 discharge or emission, and to take samples of the discharge or emission.
- 6.7.1.5. No discharge or emission to sewer shall take place which might give rise to any reaction within the sewer or to the liberation of by-products which may be of environmental significance.
- 6.7.1.6. Materials classifiable as 'Hazardous Wastes' under the Waste Management Acts 1996 to 2003, shall not be discharged to the foul sewer.
- 6.7.1.7. The licensee shall ensure that the discharge shall not contain dissolved methane, petroleum spirits or organic solvents (including chlorinated organic solvents), at concentrations which would give rise to flammable or explosive vapours in the sewer.
- 6.7.1.8. Non-trade effluent wastewater (e.g. firewater, accidental spillage) which occurs on-site shall not be discharged to the sewer without the prior authorisation of the Sanitary Authority.
- 6.7.1.9. The licensee shall provide and maintain an inspection chamber in a suitable position in connection with each pipe through which a discharge or emission is being made. Each such inspection chamber or manhole shall be constructed and maintained by the licensee so as to permit the taking of samples of the discharge.
- 6.7.1.10. The licensee shall submit monitoring results to the Sanitary Authority on an annual basis.
- 6.7.1.11. The method of calculating the volumes of trade effluent discharges shall be as agreed with the Sanitary Authority.
- 6.8. Emission limit values for emissions to sewer in this licence shall be interpreted in the following way:-
- a) Continuous monitoring.
No flow value shall exceed the specified limit.
 - b) Non-Continuous monitoring.
Eight out of ten consecutive results, calculated as daily mean concentration or mass emission values on the basis of flow proportional composite sampling shall not exceed 1.2 times the emission limit value.
 - c) No grab sample shall exceed 1.2 times the emission limit value.

REASON: *To control emissions from the facility and provide for the protection of the environment and to provide for the requirements of the Sanitary Authority in accordance with Section 52 of the Waste Management Acts 1996 to 2003.*

CONDITION 7 NUISANCE CONTROL

- 7.1 The licensee shall ensure that mud, dust, litter and odours do not give rise to nuisance at the facility or in the immediate area of the facility. Any method used by the licensee to control any such nuisance shall not cause environmental pollution.
- 7.2 The road network in the vicinity of the facility shall be kept free from any debris caused by vehicles entering or leaving the facility. Any such debris or deposited materials shall be removed without delay.

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7.3 Litter Control

7.3.1 All loose litter or other waste, placed on or in the vicinity of the facility, other than in accordance with the requirements of this licence, shall be removed, subject to the agreement of the landowners, immediately and in any event by 10.00am of the next working day after such waste is discovered.

7.3.2 The licensee shall ensure that all vehicles delivering waste to and removing waste and materials from the facility are appropriately covered.

7.4 Dust/Odour Control

7.4.1 In dry weather, site roads and any other areas used by vehicles shall be sprayed with water as and when required to minimise airborne dust nuisance.

7.4.2 Prior to the date of commencement of the waste activities at the facility, the licensee shall install and provide adequate measures for the control of odours and dust emissions, including fugitive dust emissions, from the facility. Such measures shall at a minimum include the following:-

7.4.2.1 Dust curtains shall be maintained on the entry/exit points from the waste facility buildings, all other doors in this building shall be kept closed where possible.

7.4.2.2 Installation of an odour management system.

7.4.2.3 Provision of 100% duty capacity and 50% stand by capacity, back ups and spares must be provided for the air handling, ventilation and abatement plant.

REASON: To provide for the control of nuisance.

CONDITION 8 MONITORING

8.1. The licensee shall carry out such monitoring and at such locations and frequencies as set out in *Schedule D: Monitoring* of this licence. Unless otherwise specified by this licence, all environmental monitoring shall commence no later than two months after the commencement of waste acceptance at the facility.

8.2. The licensee shall amend the frequency, locations, methods and scope of monitoring as required by this licence only upon the written instruction of the Agency and shall provide such information concerning such amendments as may be requested in writing by the Agency. Such alterations shall be carried out within any timescale nominated by the Agency.

8.3. Monitoring and analysis equipment shall be operated and maintained in accordance with the manufacturers' instructions (if any) so that all monitoring results accurately reflect any emission, discharge or environmental parameter.

8.4. 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.

8.5. The licensee shall maintain all sampling and monitoring points, and clearly label and name all sampling and monitoring locations, so that they may be used for representative sampling and monitoring.

8.6. Within three months of the date of grant of this licence, the licensee shall submit to the Agency an appropriately scaled drawing(s) showing all the monitoring locations that are stipulated in

this licence including any noise sensitive locations to be monitored. The drawing(s) shall include the eight-digit national grid reference of each monitoring point.

- 8.7. The licensee shall install on all emission points such sampling points or equipment, including any data-logging or other electronic communication equipment, as may be required by the Agency. All such equipment shall be consistent with the safe operation of all sampling and monitoring systems.
- 8.8. Within one month of the date of grant of this licence, the following information shall be submitted to the Agency for its agreement: the names, qualifications and a summary of relevant experience of all persons that will carry out all sampling and monitoring as required by this licence and who carry out the interpretation of the results of such sampling and monitoring. Any proposed changes to the above shall be submitted in writing to the Agency for its agreement.
- 8.9. 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.
- 8.10. Biological Assessment
- 8.10.1. A biological assessment of the River Griffeen at the northern boundary of the facility shall be undertaken within six months of the date of commencement of waste acceptance at the facility and as may be required thereafter. This assessment shall use appropriate biological methods such as the EPA Q-rating system for the assessment of rivers and streams. The location of monitoring points shall be agreed by the Agency.
- 8.11. Archaeological Assessment
- 8.11.1. Prior to the development of any undisturbed area, the advice of The Heritage Section of the Department of the Environment, Heritage and Local Government (formerly Dúchas) shall be sought. On completion of such development a report of the results of any archaeological monitoring shall be submitted to The Development Applications Section and to the Agency.
- 8.12. Nuisance Monitoring
- 8.12.1. The licensee shall, at a minimum of one week intervals, inspect the facility and its immediate surrounds for nuisances caused by litter, mud, dust and odours.

REASON: To ensure compliance with the conditions of this licence by provision of a satisfactory system of monitoring of emissions.

CONDITION 9 CONTINGENCY ARRANGEMENTS

- 9.1. In the event of an incident the licensee shall immediately:-
- a) identify the date, time and place of the incident;
 - b) carry out an immediate investigation to identify the nature, source and cause of the incident and any emission arising therefrom;
 - c) isolate the source of any such emission;

- d) evaluate the environmental pollution, if any, caused by the incident;
- e) identify and execute measures to minimise the emissions/malfunction and the effects thereof;
- f) provide a proposal to the Agency for its agreement within one month of the incident occurring to:-
 - i) identify and put in place measures to avoid reoccurrence of the incident; and
 - ii) identify and put in place any other appropriate remedial action.

9.2. The licensee shall, prior to commencement of waste acceptance at the facility, submit a written Emergency Response Procedure (ERP) to the Agency for its agreement. The ERP shall address any emergency situations which may originate on the facility and shall include provision for minimising the effects of any emergency on the environment. This shall include a risk assessment to determine the requirements at the facility for fire fighting and fire water retention facilities. The Fire Authority shall be consulted by the licensee during this assessment.

9.3. The licensee shall have in storage an adequate supply of containment booms and/or suitable absorbent material to contain and absorb any spillage at the facility. Once used the absorbent material shall be disposed of at an appropriate facility.

9.4. Emergencies

9.4.1. In the event of a complete breakdown of equipment or any other occurrence which results in the closure of the facility, any waste arriving at or already collected at the facility shall be transferred directly to an appropriate licensed facility until such time as the facility is returned to a fully operational status. Such a breakdown event will be treated as an emergency and rectified as soon as possible.

9.4.2. All significant spillages occurring at the facility shall be treated as an emergency and immediately cleaned up and dealt with so as to alleviate their effects.

9.4.3. No waste shall be burnt within the boundaries of the facility. A fire at the facility shall be treated as an emergency and immediate action shall be taken to extinguish it and notify the appropriate authorities.

REASON: *To ensure compliance with the conditions of this licence by provision of a satisfactory system of monitoring of emissions.*

CONDITION 10 RECORDS

10.1 The licensee shall keep the following documents at the facility office:-

- a) the current waste licence and specified attachments/drawings relating to the facility;
- b) the current EMS for the facility;
- c) the previous year's AER for the facility; and
- d) all written procedures produced by the licensee which relate to the licensed activities.

10.2 The licensee shall maintain a record for each load of waste arriving at and departing from the facility. The licensee shall record the following:-

- a) the date;
- b) the name of the carrier (including if appropriate, the waste collection permit details);

- c) the vehicle registration number;
- d) the name of the producer(s)/collector(s) of the waste as appropriate;
- e) the name of the waste facility (if appropriate) from which the load originated including the waste licence or waste permit register number;
- f) a description of the waste including the associated EWC codes;
- g) the quantity of the waste, recorded in tonnes;
- h) the name of the person checking the load;
- i) where loads or wastes are removed or rejected, details of the date of occurrence, the types of waste and the facility to which they were removed including the waste licence and waste permit register number of these facilities as appropriate; and
- j) where applicable a consignment note number (including transfrontier shipment notification and movement/tracking form numbers, as appropriate).

10.3 The following records shall be maintained by the licensee:-

- a) the types and quantities of waste recovered at the facility each year. These records shall include the relevant EWC Codes and any details required to complete national reports on waste statistics;
- b) all training undertaken by facility staff;
- c) results from all integrity tests of bunds and other structures and any maintenance or remedial work arising from them;
- d) details of all nuisance inspections; and
- e) the names and qualifications of all persons who carry out all sampling and monitoring as required by this licence and who carry out the interpretation of the results of such sampling and monitoring.

10.4 The licensee shall maintain a record of all complaints relating to the operation of the activity. Each such record shall give details of the following:-

- a) date and time of the complaint;
- b) the name of the complainant;
- c) details of the nature of the complaint;
- d) actions taken on foot of the complaint and the results of such actions; and,
- e) the response made to each complainant.

10.5 A record shall be kept of each consignment of wastewater removed from the facility. The record shall include the following:-

- a) the name of the carrier;
- b) the date and time of removal of wastewater from the facility;
- c) the volume of wastewater, in cubic metres, removed from the facility on each occasion;
- d) the name and address of the Waste Water Treatment Plant or other authorised facility agreed by the Agency to which the wastewater was transported; and
- e) any incidents or spillages of wastewater during its removal or transportation.

REASON: To provide for the keeping of proper records of the operation of the facility.

CONDITION 11 REPORTS AND NOTIFICATIONS

11.1 No alteration to, or reconstruction in respect of, the activity or any part thereof which would, or is likely to, result in:

- a) A material change or increase in:
 - The nature or quantity of any emission;
 - The abatement/treatment or recovery systems;
 - The range of processes to be carried out;
 - The fuels, raw materials, products or wastes to be generated or accepted, or

b) Any changes in:

- The site management and control with adverse environmental significance,

shall be carried out or commenced without prior notice to, and without the prior written agreement of, the Agency.

11.2 Unless otherwise agreed by the Agency, all reports and notifications submitted to the Agency shall:-

- a) be sent to the Agency's Dublin Regional Inspectorate, McCumiskey House, Richview, Clonskeagh Road, Dublin 14;
- b) comprise one original and two copies unless additional copies are required;
- c) be formatted in accordance with any written instruction or guidance issued by the Agency;
- d) include whatever information as is specified in writing by the Agency;
- e) be identified by a unique code, indicate any modification or amendment, and be correctly dated to reflect any such modification or amendment;
- f) be submitted in accordance to the relevant reporting frequencies specified by this licence, such as in *Schedule E: Recording and Reporting to the Agency* of this licence;
- g) be accompanied by a written interpretation setting out their significance in the case of all monitoring data; and
- h) be transferred electronically to the Agency's computer system if required by the Agency.

11.3 In the event of an incident occurring on the facility, the licensee shall:-

- a) notify the Agency as soon as practicable and in any case not later than 10.00 am the following working day after the occurrence of any incident;
- b) submit a written record of the incident, including all aspects described in Condition 9.1(a-e), to the Agency as soon as practicable and in any case within five working days after the occurrence of any incident;
- c) In the event of any incident which relates to discharges to sewer, having taken place, the licensee shall notify the Local and Sanitary Authority as soon as practicable, after such an incident and in any case not later than 10:00am on the following working day after such an incident;
- d) In the case of any incident which relates to discharges to water, the licensee shall notify the Local Authority and the Eastern Regional Fisheries Board as soon as practicable after

such an incident and in any case not later than 10:00am on the following working day after such an incident; and

- e) Should any further actions be taken as a result of an incident occurring, the licensee shall forward a written report of those actions to the Agency as soon as practicable and no later than ten days after the initiation of those actions.

11.4 Annual Environmental Report

11.4.1. The licensee shall submit to the Agency for its agreement, by 31st March each year, an Annual Environmental Report (AER) for the previous year.

11.4.2. The AER shall include as a minimum the information specified in Schedule F: *Content of Annual Environmental Report* and shall be prepared in accordance with any relevant written guidance issued by the Agency.

REASON: *To provide for proper reporting and notification of the Agency.*

CONDITION 12 CHARGES AND FINANCIAL PROVISIONS

12.1 Agency Charges

12.1.1 The licensee shall pay to the Agency an annual contribution of €18,389, or such sum as the Agency from time to time determines, having regard to variations in the extent of reporting, auditing, inspection, sampling and analysis or other functions carried out by the Agency, towards the cost of monitoring the activity as the Agency considers necessary for the performance of its functions under the Waste Management Acts 1996 to 2003. The first payment shall be a pro-rata amount for the period from the date of this licence to the 31st day of December, and shall be paid to the Agency within one month from the date of the licence. In subsequent years the licensee shall pay to the Agency such revised annual contribution as the Agency shall from time to time consider necessary to enable performance by the Agency of its relevant functions under the Waste Management Acts 1996 to 2003, and all such payments shall be made within one month of the date upon which demanded by the Agency.

12.1.2 In the event that the frequency or extent of monitoring or other functions carried out by the Agency needs to be increased the licensee shall contribute such sums as determined by the Agency to defraying its costs in regard to items not covered by the said annual contribution.

12.2 Financial Provision for Closure, Restoration and Aftercare

12.2.1 The licensee shall arrange for the completion of a comprehensive and fully costed Environmental Liabilities Risk Assessment for the facility which will address liabilities arising from the carrying on of the activities to which this licence relates. A report on this assessment shall be submitted to the Agency for its agreement within six months of date of grant of this licence.

12.2.2 Within nine months of the date of grant of this licence, the licensee shall make a Proposal for Financial Provision to the Agency for its agreement to cover any liabilities incurred by the licensee in carrying on the activities to which this licence relates. Such provision shall be maintained by the licensee unless otherwise agreed by the Agency.

12.2.3 The amount of financial provision, held under Condition 12.2.2 shall be reviewed and revised as necessary, but at least annually. Any proposal for such a revision shall be submitted to the Agency for its agreement.

12.2.4 The licensee shall within two weeks of purchase, renewal or revision of the financial provision required under Condition 12.2.2, forward to the Agency written proof of such indemnity.

12.2.5 Unless otherwise agreed any revision to the fund shall be computed using the following formula:

$$\text{Cost} = (\text{ECOST} \times \text{WPI}) + \text{CiCC}$$

Where:

Cost = Revised restoration and aftercare cost.

ECOST = Existing restoration and aftercare cost.

WPI = Appropriate Wholesale Price Index [Capital Goods, Building & Construction (i.e. Materials & Wages) Index], as published by the Central Statistics Office, for the year since last closure calculation/revision.

CiCC = Change in compliance costs as a result of change in site conditions, changes in law, regulations, regulatory authority charges, or other significant changes.

12.3 Sanitary Authority Charges.

12.3.1 The licensee shall pay to the Sanitary Authority a quarterly charge of €1.70 per cubic metre of trade effluent discharged to the foul sewer or such sum as may be determined from time to time, having regard to the variations in the cost of providing drainage and the variation in effluent reception and treatment costs. This amount shall be paid to the Sanitary Authority within one month of the date of grant of this licence and annually thereafter within one month of the date of notification by the Sanitary Authority of the updated annual amount.

12.3.2 The licensee shall pay to the Sanitary Authority an annual charge of €1,725.00, or such sum as may be determined from time to time, towards the cost of monitoring the discharge of trade effluent. This amount shall be paid to the Sanitary Authority within one month of the date of grant of this licence and annually thereafter within one month of the date of notification by the Sanitary Authority of the updated annual amount.

REASON: *To provide for adequate financing for monitoring and financial provisions for measures to protect the environment and to provide for the requirements of the Sanitary Authority in accordance with Section 52 of the Waste Management Acts 1996 to 2003.*

SCHEDULE A : Waste Acceptance

A.1 Waste Acceptance

Table A.1 Waste Categories and Quantities

WASTE TYPE	MAXIMUM (TONNES PER ANNUM) ^{Note 1}
Commercial Waste	500
Construction and Demolition Waste	500
Industrial Sludges	1,000
Other Industrial Waste	3,000
Hazardous Waste ^{Note 2}	57,500
TOTAL	62,500

Note 1: The quantities of the individual waste types may be adjusted, only with the agreement of the Agency, subject to the total annual waste quantity remaining the same.

Note 2: Hazardous waste types as listed in Table E.2.2 *Hazardous waste Types and Quantities* of the application, or as may otherwise be agreed in writing.

SCHEDULE B : Specified Engineering Works

Specified Engineering Works
Installation of drainage network including silt traps and oil interceptors.
Installation of secondary containment system with leak detection to underground settlement tanks
Installation of decant room at Hazardous Waste Transfer Station
Installation of photographic waste treatment unit at Hazardous Waste Transfer Station
Development of the facility including installation of waste handling, processing, recycling/recovery infrastructure and installation of increased waste processing capacity.
Any other works notified in writing by the Agency.

SCHEDULE C : Emission Limits

C.1 Noise Emissions Arising from the Activity: (Measured at any noise sensitive locations).

Day dB(A) L_{Aeq} (30 minutes)	Night dB(A) L_{Aeq} (30 minutes)
55	45

C.2 Dust Deposition Limits: (Measured at the monitoring points indicated in Table D.1.1).

Level (mg/m ² /day) ^{Note 1}
350

Note 1: 30 day composite sample with the results expressed as mg/m²/day.

C.3 Emissions to Atmosphere

Emission point:	A1	A2	A3
Volume to be emitted:			
Maximum in any one day	44,982 m ³	1,324 m ³	21,420 m ³
Maximum per hour:	5,292 m ³	144 m ³	2,520 m ³

Minimum discharge height: 13.7m

C.3.1 Emission limit values for emissions to air at emission point A1

Parameter	Emission Limit Value
T.A. Luft Organics Class 1	20 mg/m ³ (for mass emissions > 100 g/h of these compounds)
Total Organic Carbon (as C)	1 kg/hour

C.3.2 Emission limit values for emissions to air at emission point A2

Parameter	Emission Limit Value ^{Note 1}
T.A. Luft Organics Class 1	20 mg/m ³ (for mass emissions > 100 g/h of these compounds)
Total Organic Carbon (as C)	0.1 kg/h ^{Note 2}
	100 mg/m ³ ^{Note 3}
	75 mg/m ³ ^{Note 4}

Note 1: The emission limit value to be applied will be determined by the annual solvent use in the previous calendar year.

Note 2: Where annual solvent usage is less than 5 tonnes per annum.

Note 3: Where annual solvent usage is 5-15 tonnes per annum.

Note 4: Where annual solvent usage is above 15 tonnes per annum.

C.3.3 Emission limit values for emissions to air at emission point A3

Parameter	Emission Limit Value ^{Note 1}
T.A. Luft Organics Class 1	20 mg/m ³ (for mass emissions > 100 g/h of these compounds)
Total Organic Carbon (as C)	0.3 kg/h ^{Note 2}
	100 mg/m ³ ^{Note 3}
	50 mg/m ³ ^{Note 4}

Note 1: The emission limit value to be applied will be determined by the annual solvent use in the previous calendar year.

Note 2: Where annual solvent usage is less than 5 tonnes per annum.

Note 3: Where annual solvent usage is 5-15 tonnes per annum.

Note 4: Where annual solvent usage is above 15 tonnes per annum.

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C.4 Surface Water Discharge Limits: (Measured at the **surface water** monitoring point SW3).

Parameter	Emission Limit Value
Mineral oils	5mg/l ^{Note 1}
	100mg/l ^{Note 2}
Suspended Solids	35 mg/l ^{Note 1}

Note 1: for discharges from Class I interceptor to receiving water

Note 2: for discharges from Class II interceptor to sewer

C.5 Emission Limits for Wastewater Emissions to Sewer

Emission Point Reference No.

EFF2

Volume to be emitted:

Maximum in any one day: 200 m³

Maximum rate per hour: 50 m³/hr

Parameter	Emission Limit Value		
	Grab Sample (mg/l)	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD	1000	800	160
COD	3000	2400	480
Mineral Oils	10	20	2
Suspended solids	500	400	80
Sulphates (as SO ₄)	1000	1000	200
pH	6 – 10		
Temperature	42°C		
Detergents (as MBAS)	100	100	20
Toluene		1	0.2
o/m/p Xylenes	1	1	0.2
Zinc	5	5	1
Copper	5	5	1

SCHEDULE D : Monitoring

Monitoring to be carried out as specified below.

D.1 Monitoring Locations

Monitoring locations shall be those as set out in Table D.1.1 and shown on Drawing No. 1102/02/304 *Field Monitoring Points* of the application, unless otherwise indicated or agreed by the Agency.

Table D.1.1 Monitoring Locations

Ground Water	Surface Water	Wastewater	Air	Dust Deposition	Noise
Stations	Stations	Stations ^{Note 3}	Stations ^{Note 3}	Stations	Stations
BH1	SW1	EFF2	A1	D1	N1
BH2	SW2		A2	D2	N2
BH3	SW3 ^{Note 1}		A3	D3	N3
	KS1 ^{Note 2}			D4	N4
	KS2 ^{Note 2}				Any noise sensitive locations

Note 1: The location of the final discharge monitoring point SW3 is to be agreed by the Agency.

Note 2: The monitoring locations KS1 and KS2 are only to be used for biological assessment in accordance with Condition 8.10.

Note 3: The locations of the wastewater monitoring point and air monitoring points are shown on Drawing No. 1102/02/334 *Additional Monitoring Points* of the Article 14 reply received 24/12/03.

D.2 Dust

Table D.2.1 Dust Monitoring Frequency and Technique

Parameter (mg/m ² /day)	Monitoring Frequency	Analysis Method/Technique
Dust	Three times a year ^{Note 2}	Standard Method ^{Note 1}

Note 1: Standard method VDI2119 (Measurement of Dustfall, Determination of Dustfall using Bergerhoff Instrument (Standard Method) German Engineering Institute). A modification (not included in the standard) which 2 methoxy ethanol may be employed to eliminate interference due to algae growth in the gauge.

Note 2: Twice during the period May to September.

D.3 Noise

Table D.3.1 Noise Monitoring Frequency and Technique

Parameter	Monitoring Frequency	Analysis Method/Technique
L(A) _{EQ} [30 minutes]	Annual	Standard ^{Note 1}
L(A) ₁₀ [30 minutes]	Annual	Standard ^{Note 1}
L(A) ₉₀ [30 minutes]	Annual	Standard ^{Note 1}
Frequency Analysis(1/3 Octave band analysis)	Annual	Standard ^{Note 1}

Note 1: "International Standards Organisation. ISO 1996. Acoustics - description and Measurement of Environmental noise. Parts 1, 2 and 3."

D.4 Emissions to Air

Table D.4.1 Air emission monitoring Frequency and Technique

Parameter	Monitoring Frequency	Analysis Method/Technique
T.A. Luft Organics Class 1	annually ^{Note 1}	Adsorption/GC-MS or other method to be agreed by the Agency.
Total organic carbon (as C)	bi-annually ^{Note 1}	Adsorption/GC-MS or other method to be agreed by the Agency.
Characterisation of the VOC emission	annually ^{Note 1}	Adsorption/GC-MS or other method to be agreed by the Agency.

Note 1: Monitoring must occur during periods of maximum discharge. Production records should be available to demonstrate that gas sampling took place during periods of maximum loading.

D.5 Surface Water Emissions

Table D.5.1 Surface water Monitoring Frequency and Techniques

Parameter	Monitoring Frequency	Analysis Method/Technique
Visual Inspection ^{Note 1}	Daily	Standard Methods ^{Note 2}
pH	Quarterly	Electrometry
Chemical Oxygen Demand	Quarterly	Standard Methods ^{Note 2}
Suspended Solids	Quarterly	Standard Methods ^{Note 2}
Mineral Oils	Quarterly	Standard Methods ^{Note 3}

Note 1: The visual inspection to be carried out at the final discharge surface water monitoring location SW3.

Note 2: "Standards Methods for the Examination of Water and Wastewater", (prepared and published jointly by A.P.H.A., A.W.W.A & W.E.F) 20th Ed., American Public Health Association, 1015 Fifteenth Street, Washington DC 20005, USA.

Note 3: Samples screened for the presence of organic compounds using Gas Chromatography / Mass Spectrometry (GC/MS) or other appropriate techniques and using the list of H Substances from EU Directive 76/464/EEC and 80/68/EEC as a guideline. Recommended analytical techniques include: volatiles (US Environmental Protection Agency method 524 or equivalent), semi-volatiles (USEPA method 525 or equivalent, and pesticides (USEPA method 608 or equivalent).

D.6 Wastewater Emissions

Table D.6.1 Wastewater Monitoring Frequency and Techniques

Parameter	Monitoring Frequency	Analysis Method/Technique
Flow to sewer	Continuous	
Biological Oxygen Demand	Monthly	Standard Methods ^{Note 1, Note 2}
Chemical Oxygen Demand	Monthly	Standard Methods ^{Note 1, Note 2}
Mineral Oils	Monthly	Standard Methods ^{Note 1, Note 3}
Suspended Solids	Monthly	Standard Methods ^{Note 1, Note 2}
Sulphates (as SO ₄)	Monthly	Standard Methods ^{Note 1, Note 2}
Temperature	Monthly	Temperature probe ^{Note 3}
pH	Monthly	Electrometry ^{Note 3}
Toluene	Monthly	Standard Methods ^{Note 1, Note 3}
Detergents (as MBAS)	Monthly	Standard Methods ^{Note 1, Note 3}
o/m/p Xylenes	Monthly	Standard Methods ^{Note 1, Note 3}
Zinc	Monthly	Standard Methods ^{Note 1, Note 2}
Copper	Monthly	Standard Methods ^{Note 1, Note 2}
Metals Screen ^{Note 4}	Quarterly	ICP

Note 1: "Standards Methods for the Examination of Water and Wastewater", (prepared and published jointly by A.P.H.A., A.W.W.A & W.E.F) 20th Ed., American Public Health Association, 1015 Fifteenth Street, Washington DC 20005, USA.

Note 2: Sampling by 24-hour composite.

Note 3: Sampling by grab.

Note 4: Metals to be screened for to be agreed by the Agency in advance.

D.7 Groundwater

Table D 7.1 Groundwater - Parameters /Frequency

PARAMETER ^{Note 1}	MONITORING FREQUENCY
Visual Inspection/Odour ^{Note 2}	Monthly
Groundwater Level ^{Note 3}	Monthly
Dissolved Oxygen ^{Note 3}	Annually
Electrical Conductivity ^{Note 3}	Monthly
pH ^{Note 3}	Monthly
Temperature ^{Note 3}	Monthly
Total Alkalinity	Annually
Metals / non metals ^{Note 4}	Annually
Sulphate	Annually
Cyanide (Total)	Annually
Chloride	Annually
List I/II organic substances ^{Note 5}	Quarterly
Mineral Oil ^{Note 5}	Quarterly
BTEX ^{Note 5}	Quarterly
Arsenic	Quarterly
Mercury	Quarterly

Note 1: All the analysis shall be carried out by a competent laboratory using standard and internationally accepted procedures.

Note 2: Where there is evident gross contamination of groundwater, additional samples should be analysed.

Note 3: These parameters should be measured on-site with a portable electronic meter.

Note 4: Metals and elements to be analysed by AAS/ICP should include as a minimum: boron, cadmium, calcium, chromium (total), copper, iron, lead, magnesium, manganese, nickel, potassium, sodium and zinc.

Note 5: Samples screened for the presence of organic compounds using Gas Chromatography / Mass Spectrometry (GC/MS) or other appropriate techniques and using the list I/II Substances from EU Directive 76/464/EEC and 80/68/EEC as a guideline. Recommended analytical techniques include: volatiles (US Environmental Protection Agency method 524 or equivalent), semi-volatiles (USEPA method 525 or equivalent, and pesticides (USEPA method 608 or equivalent).

SCHEDULE E : Recording and Reporting to the Agency

Recurring Reports

Report	Reporting Frequency ^{Note1}	Report Submission Date
Environmental Management System Updates	Annually	As part of the AER.
Annual Environment Report (AER)	Annually	By 31 st March of each calendar year.
Record of incidents	As they occur	Within five days of the incident.
Bund, tank and container integrity assessment	Every three years	Six months from the date of grant of licence and one month after end of the three year period being reported on as part of the AER.
Specified Engineering Works reports	As they arise	Prior to the works commencing.
Monitoring of Surface Water Quality	Quarterly	Ten days after end of the quarter being reported on.
Monitoring of Groundwater Quality	Quarterly	Ten days after end of the quarter being reported on.
Monitoring of Wastewater	Quarterly	Ten days after end of the quarter being reported on.
Monitoring of Air Emissions	Bi-annually	Ten days after the period reported on.
Dust Monitoring	Three times a year	Submit as part of the AER.
Noise Monitoring	Annually	Submit as part of the AER.
Biological Monitoring	Annually	Six months from the date of grant of licence and thereafter as may be required as part of the AER.
Any other monitoring	As they occur	Within ten days of obtaining results.

Note 1: Unless altered at the request of the Agency

SCHEDULE F : Content of the Annual Environmental Report

Annual Environmental Report Content ^{Note 1}

Reporting Period.

Waste activities carried out at the facility.

Quantity and Composition of waste recovered, received and disposed of during the reporting period and each previous year (relevant EWC codes to be used).

Summary report on emissions.

Summary of results and interpretations of environmental monitoring, including a location plan of all monitoring locations.

Validation of air emission model using actual monitoring results from first year of operation of the facility.

Resource and energy consumption summary.

Development / Infrastructural works in place and planned, to process waste quantities projected for the following year (including plant operating capacity, provision of adequate standby capacity and provision of contingency, backup and spares in the case of breakdown).

Environmental Management System updates.

Schedule of Environmental Objectives and Targets for the forthcoming year.

Report on the progress towards achievement of the Environmental Objectives and Targets contained in previous year's report.

Full title and a written summary of any procedures developed by the licensee in the year which relates to the facility operation.

Tank, drum, pipeline and bund testing and inspection report.

Calibration certificate on oil heating temperature cut off detection unit.

Boiler efficiency test results.

Reported Incidents and Complaints summaries.

Review of Nuisance Controls.

Reports on financial provision made under this licence, management and staffing structure of the facility, and a programme for public information.

Solvent Management Plan.

Waste Recovery Report.

Report on training of staff.

Volume of wastewater produced and volume of wastewater transported off-site.

Any other items specified by the Agency.

Note 1: Content to be revised subject to the agreement of the Agency after cessation of waste acceptance at the facility.

Sealed by the seal of the Agency on this the 2nd day of December, 2004


**PRESENT when the seal of the Agency
was affixed hereto:**

Padraic Larkin, Authorised Person

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Document Amendment Record

Client:	Rilta Environmental Ltd.
Project:	Greenogue Monitoring
Title:	Annual Environmental Report

Project Number: 3084			Document Ref: Greenogue Monitoring		
0	Annual Environmental Report	ST	MC	DG	23/03/07
Revision	Purpose / Description	Originated	Checked	Authorised	Date
					

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**Rilta Environmental Ltd.
Block 402, Greenogue Business Park,
Rathcoole, County Dublin**

**ANNUAL ENVIRONMENTAL REPORT FOR THE
YEAR ENDING 31ST OF DECEMBER 2006**

Compiled March 2007

EPA WASTE LICENCE

No. 192-1



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1. Introduction

In accordance with condition 11.4 of waste licence 192-1, the following Annual Environmental Report includes all information specified in Schedule F: Content of Annual Environmental Report and has been compiled with the aid of the Waste licensing draft guidance notes 19.04.99.

2. Reporting Period

Rilta Environmental Ltd (then trading as Sita Environmental) was issued with Waste Licence No: 192-1 by the EPA on December 3rd 2004. This AER covers the period from January 1st 2006 to December 31st 2006.

3. Waste Activities carried out at the Facility

The licensed activities carried out at the RILTA facility as per Waste Licence No: 192-1 are as follows:

Third Schedule of the Waste Management Act, 1996 to 2003.

Class 7: Physico-chemical treatment not referred to elsewhere in this Schedule (including evaporation, drying and calcination), which results in final compounds or mixtures, which are disposed of by means of any activity referred to in paragraphs 1 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 to any activity referred to in a 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 is produced.

Fourth Schedule of the Waste Management Acts 1996 to 2003.

Class 2: Recycling or reclamation of organic substances, which are not used as solvents (including composting and other biological transformation processes).

Class 3: Recycling or reclamation of metals and metal compounds

Class 4: Recycling or reclamation of other inorganic materials

Class 6: Recovery of components used for pollution abatement.

Class 8: Oil re-refining or other re-uses of oil.

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

4. Waste Quantities (1st January 2006 – 31st December 2006).

The following table summarises the types and quantities of waste handled over the period 1st January 2006 to 31st December 2006, at RILTA's facility.

Table.1 Waste Throughput Handled at RILTA's facility (01/01/06 to 31/12/06)

Waste Description	EWC Code	Weight/Tonnes	Final Disposal Outlet	Recycling/Disposal Code
Flocculant	01 03 09	6.16	RZR, Germany	D10 - Incineration on land
Herbicides	02 01 08*	0.47	Cedar	R13 - Storage prior to recovery
Food preparation waste	02 02 99	0.36	RZR, Germany	D10 - Incineration on land
Dairy waste	02 05 01	0.87	Premier Proteins	R3 - Organic Substance Recycling
Varnish	03 02 01*	10.30	ATM, Holland	D10 - Incineration on land
Wood preservatives	03 02 05*	0.52	Recyfuel, Belgium	D10 - Incineration on land
Wood preservatives	03 02 99	2.58	ATM, Holland	D10 - Incineration on land
Solvents	04 02 14*	11.58	Terris, France	R2 - Solvent Recovery
Sulphuric acid	06 01 01*	36.61	Revatech, Belgium	R6 - Regeneration of acids or bases
Hydrochloric acid	06 01 02*	0.74	Revatech, Belgium	R6 - Regeneration of acids or bases
Nitric acid	06 01 05*	3.31	Revatech, Belgium	R6 - Regeneration of acids or bases
Acidic waste	06 01 06*	5.17	Revatech, Belgium	R6 - Regeneration of acids or bases
Acidic waste	06 01 99	39.62	Revatech, Belgium	R6 - Regeneration of acids or bases
Potassium permanganate	06 02 04*	0.50	Enva	R13 - Storage prior to recovery
Alkaline waste	06 02 05*	3.47	Revatech, Belgium	R6 - Regeneration of acids or bases

Electronics waste	16 02 13*	0.80	Tech Rec	R13 - Storage prior to recovery
Zinc cyanide	06 03 11*	4.66	RZR, Germany	D10 - Incineration on land
Potassium nitrate	06 03 14*	9.26	Revatech, Belgium	R6 - Regeneration of acids or bases
Non specified inorganic waste	06 13 99	16.80	RZR, Germany	D10 - Incineration on land
Aqueous washing liquids	07 01 01*	12.46	ATM, Holland	D10 - Incineration on land
Organic solvents	07 01 04*	40.61	Terris, France	R2 - Solvent Recovery
Wipes	07 01 99	1.88	Recyfuel, Belgium	D10 - Incineration on land
Solvents	07 02 04*	4.21	Terris, France	R2 - Solvent Recovery
Sealants	07 02 14*	1.70	Terris, France	R2 - Solvent Recovery
Solvents	07 04 04*	9.90	Terris, France	R2 - Solvent Recovery
Waste pesticide	07 04 13*	0.01	Cedar	R13 - Storage prior to recovery
Solvents	07 05 03*	0.18	Terris, France	R2 - Solvent Recovery
Solvents	07 05 04*	29.16	Terris, France	R2 - Solvent Recovery
Solvents sludge	07 05 09*	8.12	Terris, France	R2 - Solvent Recovery
Paint related waste	08 01 11*	244.91	Recyfuel, Belgium	D10 - Incineration on land
Varnish waste	08 01 12	54.59	Revatech, Belgium	D10 - Incineration on land
Paint sludge	08 01 13*	12.91	ATM, Holland	D10 - Incineration on land
Non specified paint waste	08 01 99	6.30	ATM, Holland	D10 - Incineration on land
Ink sludge	08 03 07	3.78	ATM, Holland	D10 - Incineration on land
Ink waste	08 03 12*	300.40	ORM, Germany	R2 - Solvent Recovery
Adhesive waste	08 04 09*	5.09	ATM, Holland	D10 - Incineration on land
Adhesive waste	08 04 10	282.38	Recyfuel, Belgium	D10 - Incineration on land
Adhesive waste	08 04 11*	0.03	Recyfuel, Belgium	D10 - Incineration on land
Photo developer waste	09 01 01*	59.80	Remondis, UK	R4 - Metal recovery

Photo plate wash	09 01 02*	8.52	Remondis, UK	R4 - Metal recovery
Photo fixer waste	09 01 04*	1.40	Remondis, UK	R4 - Metal recovery
Non specified photo waste	09 01 99	0.48	Remondis, UK	R4 - Metal recovery
Oily fly ash	10 01 04*	32.96	Betrem, Germany	D1 - Landfill
Pickling acid	11 01 05*	8.01	Revatech, Belgium	R6 - Regeneration of acids or bases
Acidic waste	11 01 06*	1.78	Revatech, Belgium	R6 - Regeneration of acids or bases
Sludge and filter cake	11 01 09*	84.37	Betrem, Germany	D1 - Landfill
Electroplating waste	11 01 11*	15.34	RZR, Germany	D10 - Incineration on land
Degreasing waste	11 01 14*	0.06	Recyfuel, Belgium	D10 - Incineration on land
Liner waste	11 01 99	1.08	ATM, Holland	D10 - Incineration on land
Copper hydrometallurgy waste	11 02 05*	0.03	Revatech, Belgium	R6 - Regeneration of acids or bases
Hydrometallurgy waste	11 02 07*	0.29	Revatech, Belgium	R6 - Regeneration of acids or bases
Zinc cyanide sludge	11 03 01*	7.62	Revatech, Belgium	R6 - Regeneration of acids or bases
Coolant/glycol	12 01 09*	20.17	Recyfuel, Belgium	D10 - Incineration on land
Engine oil	13 02 06*	27.80	Recyfuel, Belgium	D10 - Incineration on land
Waste oil	13 02 08*	68.62	Recyfuel, Belgium	D10 - Incineration on land
Interceptor waste	13 05 03*	16.49	Recyfuel, Belgium	D10 - Incineration on land
Fuel waste	13 07 01*	6.21	ATM, Holland	D10 - Incineration on land
Fuel waste	13 07 03*	7.15	ATM, Holland	D10 - Incineration on land
Oil spill waste	13 08 99*	17.04	Recyfuel, Belgium	D10 - Incineration on land
Aerosols	14 06 01*	0.63	Cedar	R13 - Storage prior to recovery
Solvents	14 06 03*	25.11	Terris, France	R2 - Solvent Recovery

Solvent contaminated solids	14 06 05*	0.58	ATM, Holland	D10 - Incineration on land
Contaminated packaging	15 01 02	1.44	Recyfuel, Belgium	D10 - Incineration on land
Contaminated packaging	15 01 04	1.07	Recyfuel, Belgium	D10 - Incineration on land
Contaminated packaging	15 01 10*	100.68	Recyfuel, Belgium	D10 - Incineration on land
Absorbents	15 02 02*	139.54	ATM, Holland	D10 - Incineration on land
Absorbents	15 02 03	10.12	ATM, Holland	D10 - Incineration on land
Oil filters	16 01 07*	5.60	ATM, Holland	D10 - Incineration on land
Brake fluids	16 01 13*	5.36	ATM, Holland	D10 - Incineration on land
Antifreeze	16 01 14*	0.15	ATM, Holland	D10 - Incineration on land
Electronics waste	16 01 21*	1.20	Tech Rec	R13 - Storage prior to recovery
Solvents	16 02 13*	0.30	Terris, France	R2 - Solvent Recovery
Non specified inorganic waste	16 03 03*	31.94	RZR, Germany	D10 - Incineration on land
Non specified inorganic waste	16 03 04	6.72	RZR, Germany	D10 - Incineration on land
Non specified organic waste	16 03 05*	2.02	RZR, Germany	D10 - Incineration on land
Non specified organic waste	16 03 06	2.17	RZR, Germany	D10 - Incineration on land
Aerosols	16 05 04*	0.85	Cedar	R13 - Storage prior to recovery
Aerosols	16 05 05	0.01	Cedar	R13 - Storage prior to recovery
Lab chemicals	16 05 06*	34.98	RZR, Germany	D10 - Incineration on land
Lab chemicals	16 05 07*	11.22	RZR, Germany	D10 - Incineration on land
Lead batteries	16 06 01*	1.57	Returnbatt	R13 - Storage prior to recovery
Battery acid	16 06 06*	0.40	Revatech, Belgium	R6 - Regeneration of acids or bases
Tank cleaning waste	16 07 08*	7.38	Recyfuel, Belgium	D10 - Incineration on land

Tank cleaning waste	16 07 09*	15.93	Revatech, Belgium	D8 - Biological Treatment
Non specified tank waste	16 07 99	11.34	Recyfuel, Belgium	D10 - Incineration on land
Aqueous liquid waste	16 10 01*	31.38	Revatech, Belgium	D8 - Biological Treatment
C and D waste	17 01 06*	0.30	ATM, Holland	D10 - Incineration on land
Glass	17 02 04*	0.16	ATM, Holland	D10 - Incineration on land
Bituminous waste	17 03 01*	14.30	Recyfuel, Belgium	D10 - Incineration on land
Tar	17 03 03*	1.36	Recyfuel, Belgium	D10 - Incineration on land
Aluminium sludge	17 04 02	2.94	Revatech, Belgium	R6 - Regeneration of acids or bases
Asbestos	17 06 01*	99.22	Depon., Germany	D1 - Landfill
Asbestos	17 06 05*	5,718.45	AGR/Depon, Germany	D1 - Landfill
Clinical sharps	18 01 01	0.48	RZR, Germany	D10 - Incineration on land
Clinical wastes	18 01 03*	0.15	RZR, Germany	D10 - Incineration on land
Clinical waste	18 01 04	0.07	RZR, Germany	D10 - Incineration on land
Clinical waste	18 01 06*	56.60	RZR, Germany	D10 - Incineration on land
Clinical waste	18 01 07	0.29	RZR, Germany	D10 - Incineration on land
Clinical waste	18 01 08*	0.05	RZR, Germany	D10 - Incineration on land
Clinical waste	18 01 09	0.08	RZR, Germany	D10 - Incineration on land
Dental amalgam	18 01 10*	1.33	RZR, Germany	D10 - Incineration on land
Lab chemicals	18 02 05*	3.17	RZR, Germany	D10 - Incineration on land
Lab chemicals	18 02 06	4.00	RZR, Germany	D10 - Incineration on land
Veterinary medicine	18 02 07*	2.10	RZR, Germany	D10 - Incineration on land
Molecular sieve	19 01 99	3.60	RZR, Germany	D10 - Incineration on land

Floc agent	19 02 99	0.17	RZR, Germany	D10 - Incineration on land
Spent carbon	19 09 04	19.02	Recyfuel, Belgium	D10 - Incineration on land
Solvents	20 01 13*	1.34	Terris, France	R2 - Solvent Recovery
Acids	20 01 14*	3.07	Revatech, Belgium	R6 - Regeneration of acids or bases
Alkalines	20 01 15*	0.80	Revatech, Belgium	R6 - Regeneration of acids or bases
Photochemicals	20 01 17*	0.74	Remondis, UK	R5 - Inorganic substance recycling
Pesticides	20 01 19*	0.20	Cedar	R13 - Storage prior to recovery
Fluorescent tubes	20 01 21*	0.20	Irish Lamp Recycling	R13 - Storage prior to recovery
Aerosols	20 01 23*	0.23	Cedar	R13 - Storage prior to recovery
Edible oil and fat	20 01 25	6.98	Premier Proteins	R3 - Organic Substance Recycling
Waste oil	20 01 26*	8.35	Recyfuel, Belgium	D10 - Incineration on land
Paint waste	20 01 27*	94.09	Recyfuel, Belgium	D10 - Incineration on land
Detergents	20 01 29*	0.48	Recyfuel, Belgium	D10 - Incineration on land
Spent medicines	20 01 31*	0.60	RZR, Germany	D10 - Incineration on land
Non specified municipal waste	20 03 99	4.04	Recyfuel, Belgium	D10 - Incineration on land
Contaminated Soil	17 05 03*	42,725.81	U Nord, Germany TerraCon, Germany	D15 - Storage pending any of the operations numbered D1-D12
Waste Drums	15 01 10	103.77	Greenstar Recycling	D1 - Landfill
Waste Drums	15 01 10	15.57	Greenstar Recycling	R13 - Storage prior to recovery
Waste Drums	15 01 10	478.1	Rilta Env	R4 - Metal recovery
Waste Drums	15 01 10	788.76	Hammond Lane Metal	R4 - Metal recovery
Stonecutting Wash	01 04 13	328.96	Rilta Env	D9 - Physico chemical treatment

Chloride -containing Drilling Muds	01 05 08	115.20	Rilta Env	D9 - Physico chemical treatment
Wood processing Wash	03 01 99	10.32	Rilta Env	D9 - Physico chemical treatment
Tank bottom sludges	05 01 03*	1.72	Rilta Env	D9 - Physico chemical treatment
Acidic waste	06 01 06*	20.78	Rilta Env	D9 - Physico chemical treatment
Effluent treatment sludges	06 05 02*	21.82	Rilta Env	D9 - Physico chemical treatment
Aqueous washing liquids	07 01 01*	30.24	Rilta Env	D9 - Physico chemical treatment
Aqueous washing liquids	07 03 01*	25.82	Rilta Env	D9 - Physico chemical treatment
Paint related waste	08 01 11*	32.09	Rilta Env	D9 - Physico chemical treatment
Aqueous liquid waste containing ink	08 03 08	6.55	Rilta Env	D9 - Physico chemical treatment
Sludges from boiler cleansing	10 01 22*	21.88	Rilta Env	D9 - Physico chemical treatment
Sludges from boiler cleansing	10 01 23	98.20	Rilta Env	D9 - Physico chemical treatment
Sludges and filter cake	11 01 09*	16.92	Rilta Env	D9 - Physico chemical treatment
Aqueous rinsing liquids	11 01 11*	5.80	Rilta Env	D9 - Physico chemical treatment
Coolant	12 01 09*	1,836.41	Rilta Env	D9 - Physico chemical treatment
Mineral-based hydraulic oils	13 01 10*	7.23	Rilta Env	D9 - Physico chemical treatment
Synthetic hydraulic oils	13 01 11*	1.50	Rilta Env	D9 - Physico chemical treatment
Hydraulic oils	13 01 13*	11.86	Rilta Env	D9 - Physico chemical treatment
Mineral-based engine, gear and lub oils	13 02 04*	0.92	Rilta Env	D9 - Physico chemical treatment
Mineral-based engine, gear and lub oils	13 02 05*	12.10	Rilta Env	D9 - Physico chemical treatment
Synthetic gear, engine and lub oils	13 02 06*	45.08	Rilta Env	D9 - Physico chemical treatment
Engine, gear and lub oils	13 02 07*	11.44	Rilta Env	D9 - Physico chemical treatment

Engine, gear and lub oils	13 02 08*	742.56	Rilta Env	D9 - Physico chemical treatment
Bilge oil	13 04 03*	230.04	Rilta Env	D9 - Physico chemical treatment
Solids from grit chambers	13 05 01*	25.88	Rilta Env	D9 - Physico chemical treatment
Sludges from oil/water separators	13 05 02*	3.00	Rilta Env	D9 - Physico chemical treatment
Interceptor sludges	13 05 03*	9,871.47	Rilta Env	D9 - Physico chemical treatment
Oily water	13 05 07*	84.70	Rilta Env	D9 - Physico chemical treatment
Wastes from grit chambers	13 05 08*	8.94	Rilta Env	D9 - Physico chemical treatment
Fuel oil and diesel	13 07 01*	150.39	Rilta Env	D9 - Physico chemical treatment
Mixed Fuels	13 07 03*	107.74	Rilta Env	D9 - Physico chemical treatment
Oil spill waste	13 08 99*	463.49	Rilta Env	D9 - Physico chemical treatment
Brake fluids	16 01 13*	11.01	Rilta Env	D9 - Physico chemical treatment
Antifreeze	16 01 14*	0.12	Rilta Env	D9 - Physico chemical treatment
Electrolyte from batteries	16 06 06*	22.51	Rilta Env	D9 - Physico chemical treatment
Tank cleaning waste	16 07 08*	1,770.18	Rilta Env	D9 - Physico chemical treatment
Tank cleaning waste	16 07 09*	7.42	Rilta Env	D9 - Physico chemical treatment
Non specified tank waste	16 07 99	387.76	Rilta Env	D9 - Physico chemical treatment
Aqueous liquid waste	16 10 01*	1,244.22	Rilta Env	D9 - Physico chemical treatment
Dredging Spoil	17 05 06	1.00	Rilta Env	D9 - Physico chemical treatment
Waste oil	20 01 26*	17.88	Rilta Env	D9 - Physico chemical treatment
Paint waste	20 01 27*	274.30	Rilta Env	D9 - Physico chemical treatment
Non specified municipal waste	20 03 99	1.52	Rilta Env	D9 - Physico chemical treatment

Condition 1.4 of Waste Licence No: 192-1 allows RILTA to accept up to 62,500 tonnes/year of waste consisting of hazardous waste, commercial waste, construction and demolition waste, industrial sludges and industrial waste at the facility. The above table shows that the total volume of waste accepted by RILTA from January 1st 2006 to December 31st 2006 was 70,257 tonnes/year. 42,725.81 tonnes of this total is classified as Contaminated Soil. Rilta Environmental Ltd. is currently requesting an increase in this limit to reflect an increase in the quantity of soil that is being stored and transferred from the site.

5. Summary Report on Emissions

Schedule C of Waste Licence 192-1 requires RILTA to carry out noise, air, dust, surface water, groundwater and wastewater emissions monitoring. The locations of these monitoring points are shown on Drawing 1250/01/1002, as submitted to the Environmental Protection Agency on the 28th of February, 2005.

Monthly, Quarterly and Annual monitoring was carried out during the period from 01/01/06 to 31/12/06. All monitoring results and reports have been submitted to the agency as required by Schedule E of the licence. The following is a summary of the results and findings of the 2006 monitoring period.

5.1 Groundwater Emissions

5.1.1 Groundwater monitoring point 1 (BH1)

Location: E301555 N228440

pH, Conductivity: The pH of the analysed groundwater from BH1 ranged from 7.35 in February 2006 to 7.97 in November 2006. The values are within the normal range and reflect the natural conditions of this groundwater.

The conductivity was ranging from 602 μ S/cm in August 2006 to 669 μ S/cm in November 2006. This range of values is considerably lower than the Drinking Water Regulations.

Heavy metals:

Arsenic at BH1 was recorded as below the detection limit for all monitoring events with the exception of the May monitoring event when the value was reported as 2 μ g/l. All groundwater sampled from BH1 was also found to contain a value of Mercury below the detection limit.

Copper, Chromium, Cadmium, Nickel and Zinc were all analysed as part of the annual groundwater set of parameters for BH1. All were below the regulatory limits set by the Drinking Water Regulation

standards and the EPA Guideline Values.

Inorganic:

All inorganic parameters were within the limits set by the Drinking Water Regulation standards and the EPA Guideline Values.

List 1/11 Organic Substances, Mineral Oil, BTEX:

For all groundwater sampled at BH1 from January to December 2006, List1/11 Organic Substances, Mineral Oil, BTEX were all found to be below the detection limit.

5.1.2 Groundwater monitoring point 2 (BH2)

Location: E301600 N228550

pH, Conductivity:

The pH of the analysed groundwater from BH2 ranged from 10.6 in August 2006 to 12.29 in May 2006. These values are elevated in comparison to the Drinking Water Standards which have a pH range of >6.5 and <9.5. However, the pH value for groundwater in the area was above the limits of the Drinking Water Standards when the samples were taken in September 2004, prior to commencement of activities. Therefore, the elevated pH value throughout 2006 is not thought to be as a result of activities on site, as this baseline assessment indicates that the pH of the groundwater was elevated in September 2004 with values of 11.63 and 11.73 reported for GW2 (BH2) and GW3 (BH3) respectively. Rilta Environmental has already furnished a detailed report on elevated pH levels to the Agency.

The conductivity was ranging from 760 μ S/cm in November 2006 to 1941 μ S/cm in May 2006. These values are considerably lower than the Drinking Water Regulations but are higher than the EPA Guideline Values.

Heavy metals:

Arsenic at BH2 was recorded within the range 2-8 μ g/l and this is well within the limit of 50 μ g/l set in the Drinking Water Regulations. Similar to 2005, all groundwater sampled from BH2 was found to contain a value of Mercury below the detection limit.

Chromium, Copper, Cadmium, Nickel and Zinc were all analysed as part of the annual groundwater set of parameters for BH2. All were below the detection limits set by the Drinking Water Regulation standards and the EPA Guideline Values with the exception of Nickel. Nickel was recorded as 32 μ g/l, which is elevated in comparison to the EPA Guideline Value of 20 μ g/l.

Inorganic:

All inorganic parameters were within the limits set by the Drinking Water Regulation standards and the EPA Guideline Values with the exception of Chloride, Potassium and Sodium. Chloride was within the limit set by the Drinking Water Regulations but above the EPA Guideline value. Potassium was elevated with a value of 13mg/l compared with the EPA Guideline Value of 5mg/l and slightly elevated in comparison to the Drinking Water Regulation Limit of 12mg/l. Sodium was also elevated in comparison to the EPA Guideline Limit and the Drinking Water Regulations.

List 1/11 Organic Substances, Mineral Oil, BTEX:

Similar to 2005, for all groundwater sampled at BH2 from January to December 2006, List1/11 Organic Substances, Mineral Oil and BTEX were found to be below the detection limit.

5.1.3 Groundwater monitoring point 3 (BH3)

Location: E301630 N228555

pH, Conductivity:

The pH of the analysed groundwater from BH3 ranged from 11.96 in February 2006 to 12.43 in May 2006. The values are elevated in comparison to the Drinking Water Standards which have a pH range of >6.5 and <9.5. However, the pH value for groundwater in the area was above the limits of the Drinking Water Standards when the samples were taken in September 2004, prior to commencement of activities. Therefore, the elevated pH value throughout 2006 is not thought to be as a result of activities on site, as this baseline assessment indicates that the pH of the groundwater was elevated in September 2004 with values of 11.63 and 11.73 reported for GW2 (BH2) and GW3 (BH3) respectively. Rilta Environmental has already furnished a detailed report on elevated pH levels to the Agency.

The conductivity was ranging from 1310 μ S/cm in August 2006 to 1992 μ S/cm in November 2006. These values are elevated in comparison to the EPA Guideline values. However, all values are within the S.I. No. 439 of 2000 Drinking Water Regulation limit which is 2500 μ S/cm., compared to the results of the 2005 monitoring period when two quarterly conductivity results were elevated in comparison to this limit.

Heavy metals:

Arsenic at BH3 was recorded within the range 2-8 μ g/l and this is well within the limit of 50 μ g/l set in the Drinking Water Regulations. All groundwater sampled from BH3 was also found to contain a value of Mercury below the detection limit.

Chromium, Copper, Cadmium, Nickel and Zinc were all analysed as part of the annual groundwater set of parameters for BH3. All were below the detection limits set by the Drinking Water Regulation standards and the EPA Guideline Values with the exception of Copper. Nickel was recorded as 32µg/l, which is elevated in comparison to the EPA Guideline Value of 20µg/l.

Similar to the results of the 2005 monitoring at this facility, Copper was elevated when compared to BH1 and BH2 but was well within the Drinking Water Regulation standards. The value of 40µg/l reported for Copper was elevated in comparison to the EPA Guideline Value of 30µg/l.

Inorganic:

All inorganic parameters were within the limits set by the Drinking Water Regulation standards and the EPA Guideline Values with the exception of Chloride, Sulphate and Potassium. Chloride and Potassium were elevated above the EPA Guideline Value but within the Drinking Water Regulations. Sulphate was elevated in comparison to both the Drinking Water Regulations and the EPA Guideline limit with a value of 408µg/l.

List 1/11 Organic Substances, Mineral Oil, BTEX:

For all groundwater sampled at BH3 from January to December 2006, List 1/11 Organic Substances, Mineral Oil, BTEX were all found to be below the detection limit.

5.2 Surface Water Emission

The quarterly reports in respect of Surface Water Emissions have been submitted to the EPA in April, July and October 2006 and January 2007 as required by Schedule E of the licence. The following is a summary of the values recorded for each parameter.

5.2.1 Surface Water Monitoring Point 1: (SW1)

Location: E301670 N228562

pH:

The pH of the analysed groundwater from SW1 ranged from 7.19 in February 2006 to 8.25 in November 2006. The values are within the normal range and reflect the natural conditions of this surface water.

Chemical Oxygen Demand:

Similar to 2005, the chemical oxygen demand for SW1 was below the level of detection for all monitoring events.

Suspended Solids:

The level of suspended solids in the samples taken for SW1 were below the level of detection for all monitoring events, with the exception of the February sample. This sample recorded a level of suspended solids above the MAC limits, most likely due to meteorological conditions at this time.

Mineral Oils:

Similar to 2005, the level of Mineral Oil recorded for SW1 was below the level of detection for all monitoring events.

5.2.2 Surface Water Monitoring Point 2: (SW2)

Location: E301565 N228555

pH:

The pH of the analysed groundwater from SW2 ranged from 7.37 in February 2006 to 8.30 in August 2006. The values are within the normal range and reflect the natural conditions of this surface water.

Chemical Oxygen Demand:

Similar to 2005, the chemical oxygen demand for SW2 was below the level of detection for all monitoring events in 2006.

Suspended Solids:

The level of suspended solids in the samples taken for SW2 were below the level of detection for all monitoring events, with the exception of the February sample. This sample recorded a level of suspended solids above the MAC limits, most likely due to meteorological conditions at this time.

Mineral Oils:

Similar to 2005, the level of Mineral Oils recorded for SW2 was below the level of detection for all monitoring events in 2006.

5.2.3 Surface Water Monitoring Point 3: (SW3)

Location: E301558 N228560

pH:

The pH of the analysed groundwater from SW3 ranged from 7.38 in February 2006 to 8.26 in November 2006. The values are within the normal range and reflect the natural conditions of this surface water.

Chemical Oxygen Demand:

Similar to 2005, the chemical oxygen demand for SW3 was below the level of detection for all monitoring events.

Suspended Solids:

The level of suspended solids in the samples taken for SW3 were below the level of detection for all monitoring events, with the exception of the February sample. This sample recorded a level of suspended solids of 14mg/l, which although elevated in comparison to other quarterly results was within the limits set in the Drinking Water Regulations.

Mineral Oils:

Similar to 2005, the level of Mineral Oils recorded for SW3 was below the level of detection for all monitoring events.

5.3 Waste Water Emissions

Location: E301655 N228530

The quarterly reports in respect of "Wastewater Emissions to Sewer" have been submitted to the EPA in April, July and October 2006 and January 2007 as required by Schedule E of the licence. The following is a summary of the values recorded for each parameter.

Volume Emitted:

The total volume emitted during the reporting period was 17,990m³, which is an average of 74m³ per day, on each of the 243 days on which effluent was discharged. The maximum volume discharged was 140m³ on 3rd February 2006.

BOD:

The average value for BOD during the reporting period was 735mg/l, with a maximum and minimum value of 1504mg/l and 20mg/l respectively. The values were well within the limit emission value of 1000mg/l for all events, with the exception of March, August, September and November 2006 when BOD values of 1037mg/l, 1131mg/l, 1307mg/l, 1504mg/l were recorded respectively.

COD:

The average value for COD during the reporting period was 1492mg/l, with a maximum and minimum value of 3512mg/l and 198mg/l respectively. The values were well within the limit emission value of 3000mg/l for all events, with the exception of November 2006 when a COD value of 3512mg/l was

recorded.

Mineral Oils:

The average value for Mineral Oils during the reporting period was 88µg/l, with a maximum and minimum value of 511µg/l and <10µg/l respectively. The values were well within the limit emission value of 10,000µg/l for all monitoring events, with only the August and September mineral oil results above the detection limit of <10µg/l.

Suspended Solids:

The average value for Suspended Solids during the reporting period was 72.75mg/l, with a maximum and minimum value of 340mg/l and <10mg/l respectively. The values were well within the limit emission value of 500mg/l for all monitoring events.

Sulphates:

The average value for Sulphates during the reporting period was 477mg/l, with a maximum and minimum value of 1146mg/l and 77mg/l respectively. The values were well within the limit emission value of 1000mg/l for all monitoring events, with the exception of the value in May 2006 -1146mg/l.

pH:

The average pH value during the reporting period was 6.73 with maximum and minimum values of 7.08 and 6.07 respectively. These values are within the emission limit band of pH 6-10 for this parameter.

Temperature:

The average temperature of effluent discharged to the foul sewer during the reporting period was 13.8°C. This value is dependent solely on ambient temperature as there is no heat generated during the chemical treatment process and therefore no ELV breaches.

Detergents as Methylene Blue Active Substances (MBAS):

The average value for Detergents during the reporting period was 9.9mg/l, with a maximum value of 85.5mg/l and a minimum value of 0.7mg/l. These values are significantly lower than the emission limit of 100mg/l, with all below 10mg/l except for the maximum value cited above.

Toluene:

The average value for Toluene during the reporting period was 121µg/l, with a maximum and minimum value of 370µg/l and 30µg/l respectively. The values were well within the limit emission value of 1000µg/l for all monitoring events.

Benzene:

The average value for Benzene during the reporting period was 85µg/l, with a maximum value of 219µg/l and a minimum value of 16µg/l. These values are significantly lower than the emission limit of 1000µg/l.

Ethylbenzene:

The average value for Ethylbenzene during the reporting period was 13µg/l, with a maximum value of 29µg/l and a minimum value of <10µg/l. These values are significantly lower than the emission limit of 1000µg/l.

Total Xylene:

The average value for Xylene during the reporting period was 47µg/l, with a maximum value of 137µg/l and a minimum value of <10µg/l. These values are significantly lower than the emission limit of 1000µg/l.

Zinc (as Zn):

The average value for Zinc during the reporting period was 21.6µg/l, with a maximum value of 1572µg/l and a minimum value of 9µg/l. These values are significantly lower than the emission limit of 5000µg/l.

Copper (as Cu):

The average value for Copper during the reporting period was 8µg/l, with a maximum value of 44µg/l and a minimum value of <1µg/l. These values are significantly lower than the emission limit of 5000µg/l.

Metals Screen:

A number of metals were analysed quarterly according to Schedule D of the waste licence. The metals included Lead, Nickel, Selenium, Cadmium, Chromium, Mercury, Boron and Arsenic. The majority of the metals were valued at less than 5µg/l for all monitoring events, with many below the level of detection. Nickel and Boron were the exceptions.

Nickel recorded an average value of 309µg/l, with a maximum and minimum value of 538µg/l and 107µg/l respectively. No wastewater emission limits for Nickel are available in the waste licence.

Boron recorded an average value of 6857µg/l, with a maximum and minimum value of 7811µg/l and 6028µg/l respectively. No wastewater emission limits for Boron are available in the waste licence.

5.4 Air Emissions

Locations: A1: E301630, N228465 A2: E301620, N228440
A3: E301335, N228445

Odour Monitoring Ireland (OMI) carried out the annual air emission monitoring for T.A. Luft Organics Class 1 and Characterisation of the VOC emission. OMI also carried out the bi-annual Total organic carbon (as C) monitoring. A copy of the report is attached in Appendix A.

The report concludes that all emissions to air are within the limits of Section C3.1, C3.2 and C3.3 of Waste Licence 192-1 with some exceptions:

Round 1 –Monitoring

- The mass emission rate of VOCs (as Carbon) from monitoring locations A1 and A3 were found to be in compliance with the emission limit values stated in Schedule C.3.1 to C.3.3 of Waste Licence No. 192-1. Monitoring location A2 was not in compliance due to the non-compliant airflow rate. If the airflow rate was in compliance then VOC's as Carbon should not be compliant with the regulatory agency requirements.
- The volumetric flows from monitoring locations A1 and A3 was found to be in compliance with the emission limit value stated in Schedule C.3 of Waste Licence (No. 192-1). Monitoring location A2 was not in compliance with Schedule C.3. of Waste Licence No. 192-1. According to OMI, this monitoring point was in excess of the regulatory requirement due to the large airflow rate.

Round 2 –Monitoring

- The mass emission rate of VOCs (as Carbon) from monitoring locations A1 , A2 and A3 were found to be in compliance with the emission limit values stated in Schedule C.3.1 to C.3.3 of Waste Licence No. 192-1. It should be noted that on the day of sampling process flow was not continuous therefore results obtained from the monitoring were lower than expected.
- The volumetric flows from monitoring locations A1 and A3 were found to be in compliance with the emission limit value stated in Schedule C.3 of Waste Licence (No. 192-1). Monitoring location A2 was not in compliance with Schedule C.3 of Waste Licence No. 192-1

The air emission monitoring points highlighted above have been analysed by OMI following receipt of the bi-annual and annual reports by RILTA Environmental Ltd. At present, action is being taken to assess the air flow rates at the site in order to facilitate balancing of the extraction system.

5.5 Dust Emissions

Locations: D1: E301630, N228450 D2: E301580, N228550
D3: E301670, N228555 D4: E301630, N228420

According to Schedule D of the waste licence, dust monitoring is required within three times a year (twice between May and September). Dust monitoring was carried out at four separate locations along the northern boundaries of the subject site. The samples were delivered to Enterprise Ireland, Glasnevin for analysis.

The results for each sample location, D1, D2, D3 and D4 are included in Appendix B. In summary, according to Enterprise Ireland, Glasnevin, the air quality at the monitoring points was generally good, with a number of exceptions (highlighted in Bold below).

Table 2: Dust Monitoring Results

Monitoring Period		D1	D2	D3	D4	Source of Dust
From	To	mg/m ² .d	mg/m ² .d	mg/m ² .d	mg/m ² .d	
18.05.06	19.06.06	470**	130	711*	311	* Dust and spray from neighbouring industry truck wash.
12.07.06	09.08.06	149	62	336	252	** Dust from road and construction adjacent to boundary of subject site.
29.08.06	28.09.06	411**	326	487*	101	

5.6 Noise Emissions

Locations: N1: E301630, N228450 N2: E301580, N228550
N3: E301670, N228555 N4: E301630, N228420

TOBIN Consulting Engineers carried out a noise survey as required by Schedule D of the waste licence. Both day-time and night-time noise was monitored in December 2006. A copy of the report is attached in Appendix C.

The analysis concludes that there is no significant noise impact caused by the facility. Noise levels

recorded at all EPA agreed noise monitoring locations contain noise emissions from RILTA , noise emissions from adjacent sites and from traffic on the road network of Greenogue Business Park. These levels are typical of noise levels resulting from industrial activities. The levels are typical of noise levels resulting from industrial activities and are within the site and therefore not a reflection of emissions at noise sensitive locations.

There were no impulsive noise emissions audible at any of the monitoring locations. With regard to tonal emissions Figures 1, 5 and 7, contained in Appendix C, indicate that at N1, N3 and N4 respectively tonal components were present during the daytime frequency analysis measurement at frequencies of 80Hz, 100Hz, and 25Hz respectively. No tonal components were present during the night time frequency analysis measurements. The monitoring locations are all within the site boundary and so tonal components would not be audible at any noise sensitive location.

6. Resource and Energy Consumption Summary

The main energy use at RILTA includes:

- Gas
- Electricity
- Water

A review of electricity and gas bills for the period from 01/01/06 to 31/12/06 shows that RILTA used the following quantities.

Energy	Quantity (Dec 2006)
Gas	712,514 KwH
Electricity	305,300 KwH
Water	5,550 m ³

7. Development/ Infrastructural Works

All development/infrastructural works being undertaken at the time of the last AER have now been completed. These include:

- Installation of IBC washing system.
- Installation of industrial centrifuge.
- Installation of protective walls in contaminated soil warehouse.

No other works were undertaken during 2006.

8. Environmental Management System

The Environmental Management System has been detailed in the letter forwarded to the Environmental Protection Agency (EPA), 24th February 2005.

9. Schedule of Environmental Objectives and Targets

The Schedule of Environmental Objectives and Targets has been detailed in the letter forwarded to the Environmental Protection Agency (EPA), 24th February 2005. The schedule and associated Environmental Management Program was reviewed and updated periodically during the year. The majority of objectives and targets during this year were achieved with the following exceptions:

- EMS training of general staff incomplete to integration of ISO9002 quality standard. Further training due to be implemented in the coming year.
- The waste audit system has been partially implemented but not for all waste streams.
- Staff have been trained to undertake comprehensive site checks but system needs to be expanded to include all departments.
- While some documentation has been furnished to customers regarding waste acceptance, the detail as per EMP 10 has not been fully implemented.

An updated log of objectives and targets is included as Appendix D

10. Written Procedures

No new written procedures were added to the EMS in 2006. A copy of RIALTA's Environmental Management Systems Manual is included in Appendix E.

11. Tank, Pipeline and Bund Testing and Inspection Report

The Tank, Pipeline and bund testing and inspection report was lodged with the Environmental Protection Agency (EPA) in February 2005.

12. Calibration Certificate on Oil Heating Temperature Cut Off Detection Unit

The certificates for 2006 are included in Appendix F.

13. Boiler Efficiency

RILTA commission an independent boiler engineer (Concorde Boiler Engineering Limited) to carry

out an annual assessment of the efficiency of the natural gas boiler at the facility.

The results of the boiler test on January 4th 2007 are shown below. A copy of the test certificate is attached in Appendix G.

Parameter 2006	Result 4/1/07
Oxygen	3.5%
Carbon Monoxide	0PPM
Efficiency	80%

14. Reported Incidents

There were three reported incidents during the year. These were all as a result of breaches of licensed limits of BOD and COD on the trade effluent.

15. Complaints Summary

There were four complaints notified to Rilta Environmental during 2006. These all referred to odours emanating from site. Rilta Environmental are still in communication with the parties concerned and are working to minimise fugitive emissions.

16. Review of Nuisance Controls

The nuisance controls in operation at the site by RILTA are outlined in Section 3.6 of the Environmental Impact Statement. Reviews of nuisance control are outlined and updated as part of the Environmental Management Program.

A new improved vermin elimination system was installed in 2006.

17. Financial Provision

A proposal in respect of the financial provision was submitted to the Environmental Protection Agency for agreement, in June 2005.

18. Solvent Management Plan

A solvent management plan was prepared in 2005 with a view to reduce both solvent raw material usage and VOC emissions. The reporting period of 01/01/2005 and 31/12/2005 served to calculate

what existing solvent raw materials were used and what emissions were released. The volume of solvent used in the maintenance of the drum division vents over the last two years is as follows:

Year	Waste Throughput (Kg)	Solvent Used (ltrs)
2005	1742.0	810
2006	1386.2	840

This indicates that more solvent was used per kg of throughput. The figures of what solvent was on site at year end was not considered and will be taken into account for next year's report.

19. Waste Recovery Report

The details for waste recovered in the period 1/1/06 – 31/12/06 has been furnished to the Agency as part of the 2006 Waste Survey.

20. Report on Staff Training

A large number of training programs were completed in 2006 for both new and existing staff. Rilta Environmental's training program also included two training days for all Rilta staff based on the 2005 legislation on Health, Safety & Welfare in the workplace. A list of all training undertaken from 01/01/06 – 31/12/06 is as follows:

- Jetting training
- Counter Balance Forklift training
- Reach forklift training
- Tanker Training
- Manual Handling
- Fire Safety
- Safe Pass
- Chemical Handling
- Confined Space Entry Training
- Hazardous Chemical Training

In addition to practical training, both Gareth Reville and Colm Hussey completed the FAS Waste Management Course. In addition, another candidate, Pat Kelly, is undertaking the course at the moment.

21. Volume of Wastewater Produced and Volume of Wastewater Transported Off-Site

The waste treatment department is effectively the sole producer of wastewater on site. Other procedures may produce miniscule amounts of wastewater but these would be put through the waste treatment system so the trade effluent figures accurately reflect the wastewater produced on-site from 01/01/06 to 31/12/06, which amounts to 17,990,000 litres. This amounts to 99% of all waste treated. However, water used to mix process polymer for both the effluent and sludge treatment processes uses a significant amount of water and we also treat all our own bund area waste which isn't weighed, so the above figure would not be accurate. The fraction of treated waste made up of oil and sludge accounts for 11.89%, an increase of 25% year on year.

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APPENDIX A

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**MONITORING OF VOC CONCENTRATIONS AT SITE ENVIRONMENTAL DRUM DIVISION,
GREENOGUE BUSINESS PARK, RATHCOOLE, CO. DUBLIN**

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PREPARED BY: Mr. John Casey
ATTENTION: Ms Siobhan Tinnelly
DATE: 20th Jan. 2006
REPORT NUMBER: 2006A23
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EXECUTIVE SUMMARY

Odour Monitoring Ireland were commissioned to perform Volatile Organic Compound (VOC) monitoring of the three licensed emission points located within their facility located in Greenogue Business Park, Rathcoole, Co. Dublin.

Monitoring was performed using pre-concentration upon charcoal sorbent tubes and analysis via gas chromatography mass spectrometry (GCMS).

It was concluded from the study that:

1. The mass emission rate of VOCs (as Carbon) from monitoring locations A1 and A3 were found to be in compliance with the emission limit values stated in Section C3.1 and C3.3 of Waste Licence (No. 192-1). Monitoring location A2 was not in compliance due to the large airflow rate. If airflow rate on Monitoring location A2 was in compliance with the emission limit values then VOC as Carbon would be in compliance with the regulatory requirements.
2. The mass emission rate of TA Luft Class I Organics from all 3 monitoring locations were found to be in compliance with the emission limit values stated in Section C3.1, C3.2 and C3.3 of Waste Licence (No. 192-1).
3. The volumetric flows for monitoring locations A3 was found to be in compliance with the emission limit values stated in Section C3.1 of Waste Licence (No 192-1). Monitoring locations A1 and A2 were above the emission limit value set in Section C3.2 and C.3.3 of Waste Licence (No. 192-1). This may due to inaccurate damper control within each of the stacks.

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1. Introduction

Odour Monitoring Ireland was commissioned by Tobin Environmental Services to perform monitoring of Volatile Organic Compound (VOC) concentrations emissions from a series of three licensed emission points at the SITA Environmental Drum Division facility, Block 402, Grants Drive, Greenogue Business Park, Rathcoole, Co. Dublin. The monitoring was carried out to determine compliance with the emission limit values stated in Waste Licence (No. 192-1).

2. Material and Methods

This section describes the materials and methods used throughout the study period carried out on the 27th July 2005.

2.1 Monitoring locations

Table 2.1 outlines the three monitoring points where VOC monitoring was performed on the 27th July 2005.

Table 2.1. Monitoring points for emissions to atmosphere.

Analysis Monitoring Code	EPA location code	Location
SITA A1	A1	Drum Washer Stack
SITA A2	A2	Paint Spray Booth Stack
SITA A3	A3	Drying Tunnel Stack

2.2 VOC sampling

In order to pre-concentrate speciated VOC upon each sorbent, a pre-calibrated controlled volume of sample air will be drawn through each tube by a SKC pump for a period of 30 minutes (Active sampling/pumped sampling). Each SKC pump was pre-calibrated with their specific sorbent using a Bios Primary flow calibrator (NIST traceable certified). Each pump was calibrated to a flow rate depending on the sampling pump and sorbent tube as recommended by the sorbent manufacturer and analysing laboratory. When sampling was complete all sample tubes were sealed and stored in flexible air tight containers and transported to the gas chromatography laboratory and analysed by means of thermal desorption/solvent extraction GCMS in a UKAS accredited laboratory.

2.3 Airflow and temperature measurement

Using a calibrated pitot manometer and S type pitot tube and PT100 temperature probe, the volumetric airflow rate and temperature of the emission air stream that passes through the emission sources was determined in accordance with ISO 10780 where possible. This allowed for the determination of physical operational parameters such as temperature and volumetric airflow rate. An average of between six and ten measurements (depending on duct diameter) were carried out at two traverses at right angles to each other in a straight section of ducting for airflow rate. Temperature readings were logged continuously to a Testo 400 handheld data logger and downloaded using Com soft software where average readings were computed using Microsoft Excel.

3. Results

3.1 Assessment criteria

The results obtained from the assessment have been compared with the emission limit values outlined within Waste licence (192-1).

Table 3.1. Emission Limit Values as stated in Waste Licence (192-1).

Emission Point	Emission Volume	TA Luft Class 1 Organics		Total Organic Carbon (as C)	
	Nm ³ hr ⁻¹	mg Nm ⁻³	g hr ⁻¹	mg Nm ⁻³	kg/hr
SITA A1	5,292	20	>100	-	1.0
SITA A2	144	20	>100	-	0.10
SITA A3	2,520	20	>100	-	0.30

3.2 Results of airflow and temperature measurement

The results of the airflow and temperature measurement are presented in *Table 3.1*.

Table 3.2. Airflow rate and temperature measurements at three emission points.

Emission Point	Temperature (Kelvin)	Limit Volumetric airflow rate (Nm ³ hr ⁻¹)	Measured Volumetric airflow rate (Nm ³ hr ⁻¹)
A1	291.15	5292	9202
A2	292.15	144	1181
A3	311.05	2520	2305

3.3 Results of Speciated Volatile Organic Compound (VOC) measurement

The results of Speciated VOC measurements are presented in *Table 3.2*, *3.3* and *3.4*.

Table 3.2. Results of VOC Monitoring at Emission Point A1

Parameter	Concentration of Speciated VOC (mg Nm ⁻³)	Mass Flow of Speciated VOC (kg/hr)
o-Xylene	2.168	0.0115
Ethylbenzene	0.974	0.0052
Toluene	0.823	0.0044
1-Butanol	1.259	0.0067
Heptane, 2,2,4,6,6-pentamethyl	0.734	0.0039
o-Xylene	0.694	0.0037
Cyclohexene, 1-methyl-4-(1-methylethenyl)	1.063	0.0056
Benzene, 1,2,4-trimethyl	0.314	0.0017
Undecane	0.312	0.0016
Benzene, 1-ethyl-3-methyl	0.539	0.0029
Total Organics (as C)	<108.36	<0.99
Total Organics (as C) Limit	-	<1.0
Total TA Luft Class I	<8.88	<0.082
Total TA Luft Class I Limit	<20	<0.10

Table 3.3. Results of VOC Monitoring at Emission Point A2

Parameter	Concentration of Speciated VOC (mg Nm ⁻³)	Mass Flow of Speciated VOC (kg/hr)
o-Xylene	86.82	0.100
Benzene, 1,2,4-trimethyl-	3.85	0.004
p-Xylene	28.94	0.033
Ethylbenzene	2.46	0.003
Benzene, 1-ethyl-3-methyl-	1.73	0.002
Toluene	16.79	0.019
Benzene, 1-ethyl-2-methyl-	7.31	0.008
Limonene	0.71	0.001
Benzene, 1-methyl-3-propyl-	0.68	0.001
Total Organics (as C)	<288.80	<0.34
Total Organics (as C) Limit	-	<0.10
Total TA Luft Class I	<16.74	<0.019
Total TA Luft Class I Limit	<20	<0.10

Table 3.4. Results of VOC Monitoring at Emission Point A3

Parameter	Concentration of Speciated VOC (mg Nm ⁻³)	Mass Flow of Speciated VOC (kg/hr)
o-Xylene	2.17	0.0050
1-Butanol	1.33	0.0031
Benzene, 1,2,4-trimethyl-	1.25	0.0029
D-Limonene	0.98	0.0023
Undecane	0.68	0.0016
Benzene, 1-ethyl-3-methyl-	0.65	0.0015
Toluene	0.63	0.0014
p-Xylene	0.59	0.0013
Isobornyl acetate	0.44	0.0010
Phenylethyl Alcohol	0.18	0.0004
Total Organics (as C)	43.31	<0.10
Total Organics (as C) Limit	-	<1.0
Total TA Luft Class I	<8.9	<0.021
Total TA Luft Class I Limit	<20	<0.10

4. Discussion of results

The results of the VOC monitoring survey carried out on the 27th July 2005 are presented in *Tables 3.2 to 3.4*. These results indicate that emissions to atmosphere of total organics (as carbon) from monitoring emission points A1 and A3 were in compliance with the emission limit values stated in the Waste Licence (Number 192-1). Monitoring location A2 was not in compliance with the Total Organic Carbon (TOC) emission limit value due to the large airflow rate. If this airflow rate was in compliance with the established emission limit values then the TOC value would be in compliance. In addition, emissions of Total TA Luft Organics Class I for all emission points are in compliance with the emission limit values.

The volumetric airflow rate measurements performed on emission points A1, A2, and A3 demonstrated compliance for monitoring location A3 only. Both monitoring location A1 and A2 were not in compliance with set limit values.

5. Conclusions

The following conclusions were drawn from the study:

1. The mass emission rate of VOCs (as Carbon) from monitoring locations A1 and A3 were found to be in compliance with the emission limit values stated in Section C.3.1 to C3.3 of Waste Licence (No. 192-1). Monitoring location A2 was not in compliance with the Total Organic Carbon (TOC)

emission limit value due to the large airflow rate. If this airflow rate was in compliance with the established emission limit values then the TOC value would be in compliance.

2. The mass emission rate of TA Luft Class I Organics from all 3 monitoring locations were found to be in compliance with the emission limit values stated in Section C.3.1 to C3.3 of Waste Licence (No. 192-1).
3. The volumetric flows from monitoring locations A3 was found to be in compliance with the emission limit value stated in Section C.3.1 of Waste Licence (No. 192-1). Monitoring locations A1 and A2 were not in compliance with Section C.3.2 and C.3.3 of Waste Licence (No. 192-1).

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**MONITORING OF VOC CONCENTRATIONS AT SITE ENVIRONMENTAL DRUM DIVISION,
GREENOGUE BUSINESS PARK, RATHCOOLE, CO. DUBLIN**

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PREPARED BY: Mr. John Casey
ATTENTION: Ms Siobhan Tinnelly
DATE: 21st Jan. 2006
REPORT NUMBER: 2006A24
DOCUMENT VERSION: Document Ver. 001
REVIEWERS:

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**MONITORING OF VOC CONCENTRATIONS AT SITE ENVIRONMENTAL DRUM DIVISION,
GREENOGUE BUSINESS PARK, RATHCOOLE, CO. DUBLIN**

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PREPARED BY: Mr. John Casey
ATTENTION: Ms Siobhan Tinnelly
DATE: 20th Jan. 2006
REPORT NUMBER: 2006A23
DOCUMENT VERSION: Document Ver. 001
REVIEWERS:

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EXECUTIVE SUMMARY

Odour Monitoring Ireland were commissioned to perform Volatile Organic Compound (VOC) monitoring of the three licensed emission points located within their facility located in Greenogue Business Park, Rathcoole, Co. Dublin.

Monitoring was performed using pre-concentration upon charcoal sorbent tubes and analysis via gas chromatography mass spectrometry (GCMS).

It was concluded from the study that:

1. The mass emission rate of VOCs (as Carbon) from monitoring locations A1 and A3 were found to be in compliance with the emission limit values stated in Section C3.1 and C3.3 of Waste Licence (No. 192-1). Monitoring location A2 was not in compliance due to the large airflow rate. If airflow rate on Monitoring location A2 was in compliance with the emission limit values then VOC as Carbon would be in compliance with the regulatory requirements.
2. The mass emission rate of TA Luft Class I Organics from all 3 monitoring locations were found to be in compliance with the emission limit values stated in Section C3.1, C3.2 and C3.3 of Waste Licence (No. 192-1).
3. The volumetric flows for monitoring locations A3 was found to be in compliance with the emission limit values stated in Section C3.1 of Waste Licence (No 192-1). Monitoring locations A1 and A2 were above the emission limit value set in Section C3.2 and C.3.3 of Waste Licence (No. 192-1). This may due to inaccurate damper control within each of the stacks.

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1. Introduction

Odour Monitoring Ireland was commissioned by Tobin Environmental Services to perform monitoring of Volatile Organic Compound (VOC) concentrations emissions from a series of three licensed emission points at the SITA Environmental Drum Division facility, Block 402, Grants Drive, Greenogue Business Park, Rathcoole, Co. Dublin. The monitoring was carried out to determine compliance with the emission limit values stated in Waste Licence (No. 192-1).

2. Material and Methods

This section describes the materials and methods used throughout the study period carried out on the 27th July 2005.

2.1 Monitoring locations

Table 2.1 outlines the three monitoring points where VOC monitoring was performed on the 27th July 2005.

Table 2.1. Monitoring points for emissions to atmosphere.

Analysis Monitoring Code	EPA location code	Location
SITA A1	A1	Drum Washer Stack
SITA A2	A2	Paint Spray Booth Stack
SITA A3	A3	Drying Tunnel Stack

2.2 VOC sampling

In order to pre-concentrate speciated VOC upon each sorbent, a pre-calibrated controlled volume of sample air will be drawn through each tube by a SKC pump for a period of 30 minutes (Active sampling/pumped sampling). Each SKC pump was pre-calibrated with their specific sorbent using a Bios Primary flow calibrator (NIST traceable certified). Each pump was calibrated to a flow rate depending on the sampling pump and sorbent tube as recommended by the sorbent manufacturer and analysing laboratory. When sampling was complete all sample tubes were sealed and stored in flexible air tight containers and transported to the gas chromatography laboratory and analysed by means of thermal desorption/solvent extraction GCMS in a UKAS accredited laboratory.

2.3 Airflow and temperature measurement

Using a calibrated pitot manometer and S type pitot tube and PT100 temperature probe, the volumetric airflow rate and temperature of the emission air stream that passes through the emission sources was determined in accordance with ISO 10780 where possible. This allowed for the determination of physical operational parameters such as temperature and volumetric airflow rate. An average of between six and ten measurements (depending on duct diameter) were carried out at two traverses at right angles to each other in a straight section of ducting for airflow rate. Temperature readings were logged continuously to a Testo 400 handheld data logger and downloaded using Com soft software where average readings were computed using Microsoft Excel.

3. Results

3.1 Assessment criteria

The results obtained from the assessment have been compared with the emission limit values outlined within Waste licence (192-1).

Table 3.1. Emission Limit Values as stated in Waste Licence (192-1).

Emission Point	Emission Volume	TA Luft Class 1 Organics		Total Organic Carbon (as C)	
	Nm ³ hr ⁻¹	mg Nm ⁻³	g hr ⁻¹	mg Nm ⁻³	kg/hr
SITA A1	5,292	20	>100	-	1.0
SITA A2	144	20	>100	-	0.10
SITA A3	2,520	20	>100	-	0.30

3.2 Results of airflow and temperature measurement

The results of the airflow and temperature measurement are presented in *Table 3.1*.

Table 3.2. Airflow rate and temperature measurements at three emission points.

Emission Point	Temperature (Kelvin)	Limit Volumetric airflow rate (Nm ³ hr ⁻¹)	Measured Volumetric airflow rate (Nm ³ hr ⁻¹)
A1	291.15	5292	9202
A2	292.15	144	1181
A3	311.05	2520	2305

3.3 Results of Speciated Volatile Organic Compound (VOC) measurement

The results of Speciated VOC measurements are presented in *Table 3.2*, *3.3* and *3.4*.

Table 3.2. Results of VOC Monitoring at Emission Point A1

Parameter	Concentration of Speciated VOC (mg Nm ⁻³)	Mass Flow of Speciated VOC (kg/hr)
o-Xylene	2.168	0.0115
Ethylbenzene	0.974	0.0052
Toluene	0.823	0.0044
1-Butanol	1.259	0.0067
Heptane, 2,2,4,6,6-pentamethyl	0.734	0.0039
o-Xylene	0.694	0.0037
Cyclohexene, 1-methyl-4-(1-methylethenyl)	1.063	0.0056
Benzene, 1,2,4-trimethyl	0.314	0.0017
Undecane	0.312	0.0016
Benzene, 1-ethyl-3-methyl	0.539	0.0029
Total Organics (as C)	<108.36	<0.99
Total Organics (as C) Limit	-	<1.0
Total TA Luft Class I	<8.88	<0.082
Total TA Luft Class I Limit	<20	<0.10

Table 3.3. Results of VOC Monitoring at Emission Point A2

Parameter	Concentration of Speciated VOC (mg Nm ⁻³)	Mass Flow of Speciated VOC (kg/hr)
o-Xylene	86.82	0.100
Benzene, 1,2,4-trimethyl-	3.85	0.004
p-Xylene	28.94	0.033
Ethylbenzene	2.46	0.003
Benzene, 1-ethyl-3-methyl-	1.73	0.002
Toluene	16.79	0.019
Benzene, 1-ethyl-2-methyl-	7.31	0.008
Limonene	0.71	0.001
Benzene, 1-methyl-3-propyl-	0.68	0.001
Total Organics (as C)	<288.80	<0.34
Total Organics (as C) Limit	-	<0.10
Total TA Luft Class I	<16.74	<0.019
Total TA Luft Class I Limit	<20	<0.10

Table 3.4. Results of VOC Monitoring at Emission Point A3

Parameter	Concentration of Speciated VOC (mg Nm ⁻³)	Mass Flow of Speciated VOC (kg/hr)
o-Xylene	2.17	0.0050
1-Butanol	1.33	0.0031
Benzene, 1,2,4-trimethyl-	1.25	0.0029
D-Limonene	0.98	0.0023
Undecane	0.68	0.0016
Benzene, 1-ethyl-3-methyl-	0.65	0.0015
Toluene	0.63	0.0014
p-Xylene	0.59	0.0013
Isobornyl acetate	0.44	0.0010
Phenylethyl Alcohol	0.18	0.0004
Total Organics (as C)	43.31	<0.10
Total Organics (as C) Limit	-	<1.0
Total TA Luft Class I	<8.9	<0.021
Total TA Luft Class I Limit	<20	<0.10

4. Discussion of results

The results of the VOC monitoring survey carried out on the 27th July 2005 are presented in *Tables 3.2 to 3.4*. These results indicate that emissions to atmosphere of total organics (as carbon) from monitoring emission points A1 and A3 were in compliance with the emission limit values stated in the Waste Licence (Number 192-1). Monitoring location A2 was not in compliance with the Total Organic Carbon (TOC) emission limit value due to the large airflow rate. If this airflow rate was in compliance with the established emission limit values then the TOC value would be in compliance. In addition, emissions of Total TA Luft Organics Class I for all emission points are in compliance with the emission limit values.

The volumetric airflow rate measurements performed on emission points A1, A2, and A3 demonstrated compliance for monitoring location A3 only. Both monitoring location A1 and A2 were not in compliance with set limit values.

5. Conclusions

The following conclusions were drawn from the study:

1. The mass emission rate of VOCs (as Carbon) from monitoring locations A1 and A3 were found to be in compliance with the emission limit values stated in Section C.3.1 to C3.3 of Waste Licence (No. 192-1). Monitoring location A2 was not in compliance with the Total Organic Carbon (TOC)

emission limit value due to the large airflow rate. If this airflow rate was in compliance with the established emission limit values then the TOC value would be in compliance.

2. The mass emission rate of TA Luft Class I Organics from all 3 monitoring locations were found to be in compliance with the emission limit values stated in Section C.3.1 to C3.3 of Waste Licence (No. 192-1).
3. The volumetric flows from monitoring locations A3 was found to be in compliance with the emission limit value stated in Section C.3.1 of Waste Licence (No. 192-1). Monitoring locations A1 and A2 were not in compliance with Section C.3.2 and C.3.3 of Waste Licence (No. 192-1).

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APPENDIX B

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Client:
TES Consulting Engineers,
Block 4B,
Unit 5,
Blanchardstown Corporate Park,
Dublin 15,
Ireland.

Test Required:
Total dust deposition analysis



Attention:
Siobhán Tinnelly

Order Ref: 97339

Report Ref: 10002297

Date Received: 22nd June 2006

Reported By: Willie Kelly

Date: 29th June 2006

Four samples were received and identified as in table below, the exposure dates where from 18th May to 19th June 2006.

D 1	D 2	D 3	D 4
mg/m ² .d	mg/m ² .d	mg/m ² .d	mg/m ² .d
470	130	711	311

The fallout rates of total solids were determined on the four samples using the Begerhoff dust deposition method of analysis, as specified in T A Luft and German Standard VDI 2119, Part 2, 1972.

Comments: Samples D 1 and D 3 had noticeable amounts of dust in them and were above the mean daily dust deposition limit value of 350 mg/m².d recommended in T A Luft. Both the other two samples were within this standard.

Note: This report relates to the samples analysed only.

Willie Kelly

Environmental Policy Dept

Client:
 TES Consulting Engineers,
 Block 10-3,
 Blanchardstown Corporate Park,
 Dublin 15,
 Ireland.

Test Required:
 Total dust deposition analysis

Attention:
 Siobhán Tinnelly

Order Ref: 1369

Report Ref: 10003480

Date: Received: 10th August 2006

Reported By: Willie Kelly

Date: Reported: 15th August 2006

Four samples were received and identified as in table below:

Table 1: Results of Dust Deposition Analysis
 Units: in milligrams per metre squared per day (mg/m².d)

Monitoring Period	Site D 1	Site D 2	Site D 3	Site D 4
From 12.07.06	mg/m ² .d	mg.m ² .d	mg/m ² .d	mg/m ² .d
To 09.08.06	149	62	336	252


The fallout rates of total solids were determined on the four samples using the Begerhoff dust deposition method of analysis, as specified in T A Luft and German Standard VDI 2119, Part 2, 1972.

Comments: All four samples were within the mean daily dust deposition limit value of 350 mg/m².d recommended in T A Luft.

Note: This report relates to the samples analysed only.

Willie Kelly

 Environmental Policy Dept

TOBIN CONSULTING ENGINEERS		
PROJECT NO:		
FILE REF:		
Date Received	1 8 AUG 2006	
PASS TO	ACTION BY	DATE
		

Client:
 TES Consulting Engineers,
 Block 4B,
 Unit 5,
 Blanchardstown Corporate Park,
 Dublin 15,
 Ireland.

Test Required:
 Total dust deposition analysis

Attention:
 Siobhán Tinnelly

Order Ref: 97358

Report Ref: 10004375

Date Received: 6th October 2006

Reported By: Willie Kelly

Date Reported: 11th October 2006

Four samples were received and identified as in table below, the exposure dates where from 29th August to 28th September 2006.

D 1	D 2	D 3	D 4
mg/m ² .d	mg/m ² .d	mg/m ² .d	mg/m ² .d
411	326	487	101

The fallout rates of total solids were determined on the four samples using the Begerhoff dust deposition method of analysis, as specified in T A Luft and German Standard VDI 2119, Part 2, 1972.

Comments: Samples D1 and D3 where above the mean daily dust deposition limit value of 350 mg/m².d recommended in T A Luft.

Note: This report relates to the samples analysed only.

Willie Kelly



Environmental Policy Dept

TOBIN CONSULTING ENGINEERS		
PROJECT NO:		
FILE REF:		
Date Received	13 OCT 2006	
PASS TO	ACTION BY	DATE

APPENDIX C

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Document Amendment Record

Client:	RILTA Environmental
Project:	Greenogue Monitoring
Title:	Noise Monitoring Report – December 2006

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Project Number: 1250			Document Ref:		
0	Noise Monitoring – December 2006	AA	MMCK		20/03/07
Revision	Purpose / Description	Originated	Checked	Authorised	Date
					

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1 INTRODUCTION

This report deals with the noise monitoring requirement conditions of RILTA Environmental Ltd. Hazardous Waste Facility at Greenogue Business Park, Rathcoole, Co. Dublin, Waste Licence No. 192-1.

2 NOISE MONITORING SURVEY

The noise survey was carried out in the environs surrounding the waste facility at the locations agreed with the EPA (see Drawing No. 1250/01/1002). Weather conditions during monitoring were dry and calm with a slight breeze. The recorded wind speed at nearest Synoptic Station (Casement) was 1.34 m/s on 20/12/06.). The following conditions were adhered to in undertaking the survey:

- Measurement of noise levels was undertaken using Type 1 instrumentation;
- Cognisance was taken of the EPA's 'Environmental Noise Survey Guidance Document, 2003;
- The survey was carried out in accordance with ISO 1996 Acoustics - Description and Measurement of Environmental Noise: Parts 1/2/3.

2.1 Instrumentation Used

The following instrumentation was used in the environmental noise monitoring survey:

- One Larson Davis 824 Precision Integrating Sound Level Analyser/Data logger with *Real-Time* Frequency Analyser Facility
- Wind Shield Type: Larson Davis 2120 Windscreen.
- Calibration Type: Larson Davis Precision Acoustic Calibrator Model CA200.

2.2 Measurement Procedure

Noise monitoring was carried out on 20th December 2006 during the day (for 30 minute intervals) at four agreed EPA locations. Night time noise monitoring was also carried out on the 20th December 2006. All the environmental noise analysers had data logging facilities set on real-time, the logged data was later downloaded via a personal computer using software. One third octave frequency analysis were taken at the locations using the 824 Precision Integrating Sound Level Analyser/Data logger with *real-time* frequency analyser facility.

The measurement locations were all away from reflecting surfaces and at 1.5m height above local ground.

All acoustic instrumentation was calibrated before and after the survey period and no drift of calibration was observed (calibration level 114dB at 1000Hz).

2.3 Results of Noise Survey

The noise monitoring locations are described in Table 1 and illustrated on Drawing No. 1250/01/1002. The results of the noise survey are given in Table 2. The 1/3 Octave frequency

analysis data is given in graphical format in Appendix I.

Table 1 Noise Monitoring Locations

Monitoring Location	Description
N1	South western boundary of site
N2	North western boundary of site
N3	North eastern boundary of site
N4	South eastern boundary of site

Location N1

Noise monitoring location N1 is located at the south western boundary of the site, adjacent to the site car park and to the access road to RILTA within the Greenogue Business Park. Daytime noise sources included activities on site, site traffic and traffic on the Business Park roads. Night time noise sources included traffic on the Business Park roads, noise from neighbouring premises and occasional aircraft.

Location N2

N2 is located in the north western corner of the site behind the racked storage building. During daytime monitoring periods noise emissions from RILTA were audible, and the dominant sources of noise included heavy goods vehicles (HGVs) within the site, aircraft and traffic on Business Park roads. Aircraft and distant traffic were audible during the frequency analysis measurement. During night time monitoring periods noise emissions from RILTA were not audible and the dominant noise sources included the adjacent river and traffic on Business Park roads.

Location N3

N3 is located at the north eastern boundary of the site, adjacent the bunded tank area. Noise emissions from RILTA were audible at N3 during the daytime noise monitoring period. Dominant noise sources included activity within the site and from activity in adjacent premises. During night time measurement periods, the dominant noise sources included emissions from adjacent pipes within the RILTA premises and traffic on Business Park roads. These noise sources were audible during the frequency analysis measurement.

Location N4

Noise monitoring location N4 is located in the south eastern corner of the site. During the daytime noise monitoring periods activities in the drum centre and site traffic were the dominant sources. These emissions were audible during the frequency analysis measurement. During the night time noise monitoring periods aircraft and distant traffic were the dominant sources of noise emissions. Occasional passing traffic also contributed to noise levels.

Table 2 Noise Monitoring Results – dB(A) and 30 minute intervals

Location	Date	Time	Leq	L ₁₀	L ₉₀	Comments
DAYTIME MONITORING						
N1	20 th Dec 06	10.04	62.0	64.6	57.4	Site activities, site traffic and Business Park traffic contributed to noise levels.
N2	20 th Dec 06	12.08	60.5	61.9	55.8	Site activities were the dominant source of noise emissions. Activity is adjacent premises, birdsong and aircraft also contributed to noise levels.
N3	20 th Dec 06	11.27	73.5	77.9	57.9	Site activities and activities in adjacent premises were the dominant noise sources. Occasional aircraft, and bird song also contributed to noise levels. The adjacent flowing river was also audible.
N4	20 th Dec 06	10.46	68.3	71.9	63.0	Noise emissions from the drum centre were audible due to the open door (including a radio). Site traffic and passing traffic also contributed to noise levels.
NIGHT TIME MONITORING						
N1	20 th Dec 06	23.50	46.6	48.6	43.8	Traffic on Business Park roads was the dominant noise source. Occasional passing traffic and aircraft also contributed to noise levels.
N2	20 th Dec 06	22.40	47.7	49.2	45.4	The adjacent river was audible at this location along with distant traffic and occasional aircraft. Occasionally activity in adjacent premises contributed to noise levels.
N3	20 th Dec 06	22.04	46.3	47.8	44.0	Noise emissions from RILTA were audible mainly from adjacent pipes. Traffic on Business Parks roads and occasional aircraft also contributed to noise levels.
N4	20 th Dec 06	23.16	46.7	48.4	44.3	Traffic on Business Park roads contributed to noise levels along with occasional aircraft.

3 CONCLUSION

The noise emission limits given in Waste Licence 192-1 are 55 dB(A) for day time and 45 dB(A) for night time. These levels specifically relate to noise emissions arising from the

activity, measured at any noise sensitive location.

The noise emissions from RILTA Environmental Ltd. are given in Table 2. Noise levels recorded at all EPA agreed noise monitoring locations contain noise emissions from RILTA , noise emissions from adjacent sites and from traffic on the road network of Greenogue Business Park. These levels are typical of noise levels resulting from industrial activities. Note that the EPA agreed noise monitoring locations are all on site and do not reflect emissions at noise sensitive locations.

There were no impulsive noise emissions audible at any of the monitoring locations. With regard to tonal emissions, Figures 1, 5 and 7 indicate that at N1, N3 and N4 respectively tonal components were present during the daytime frequency analysis measurement at frequencies of 80Hz, 100Hz, and 25Hz respectively. No tonal components were present during the night time frequency analysis measurements. The monitoring locations are all within the site boundary and so tonal components would not be audible at any noise sensitive location.

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APPENDIX 1 – FREQUENCY ANALYSIS

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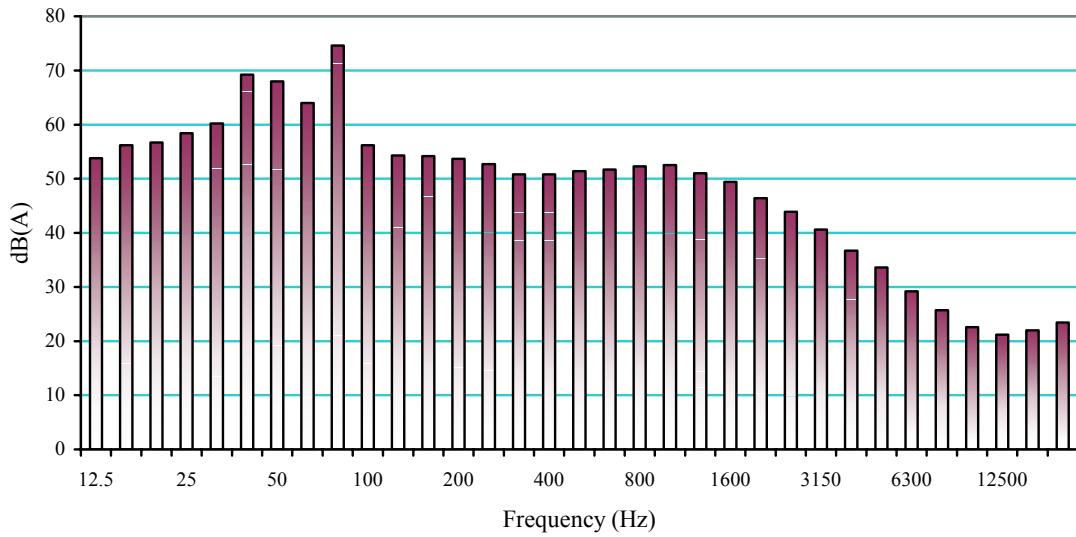


Figure 1 Daytime Frequency Analysis at N1

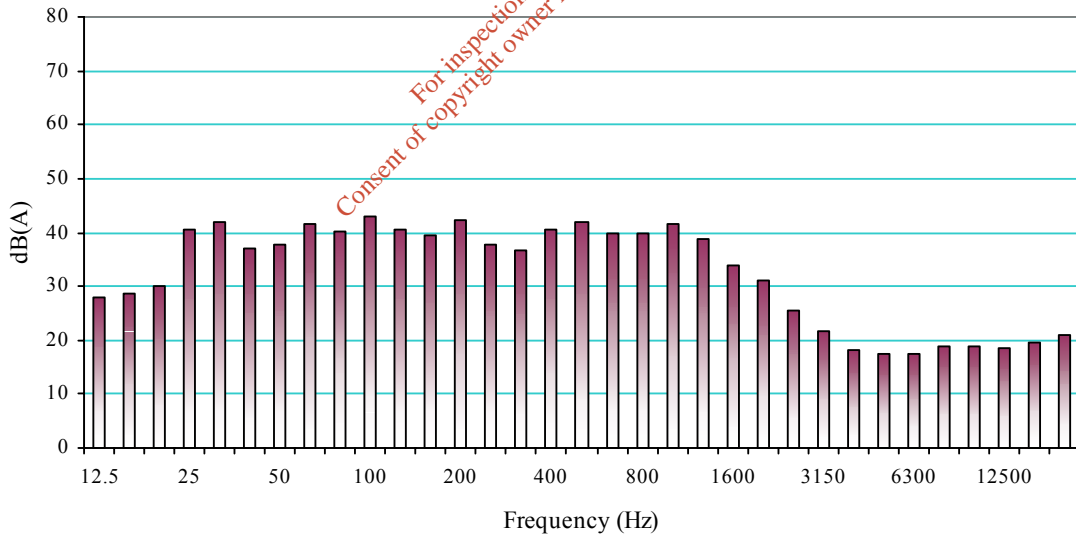


Figure 2 Night time Frequency Analysis at N1

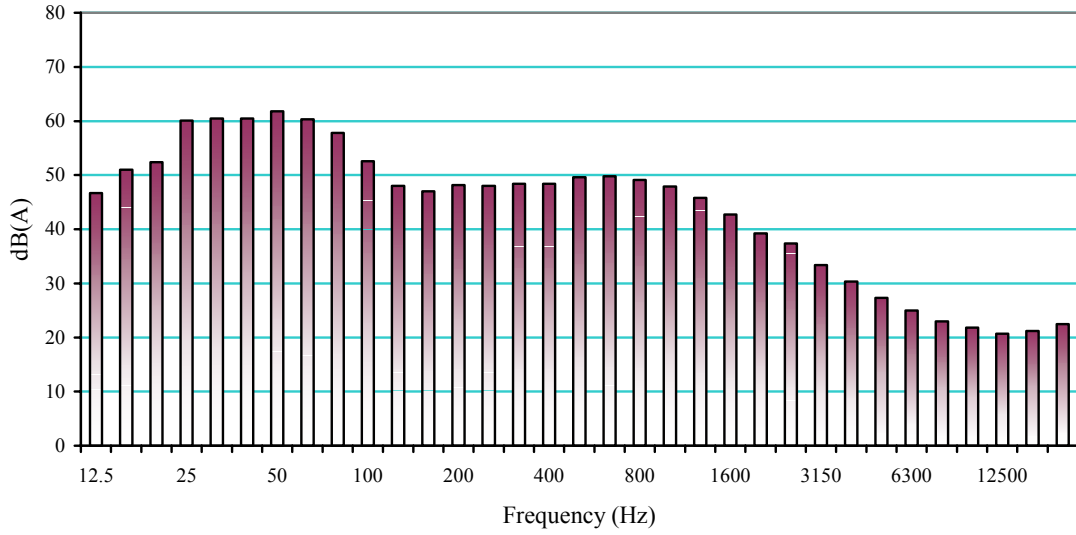


Figure 3 Daytime Frequency Analysis at N2

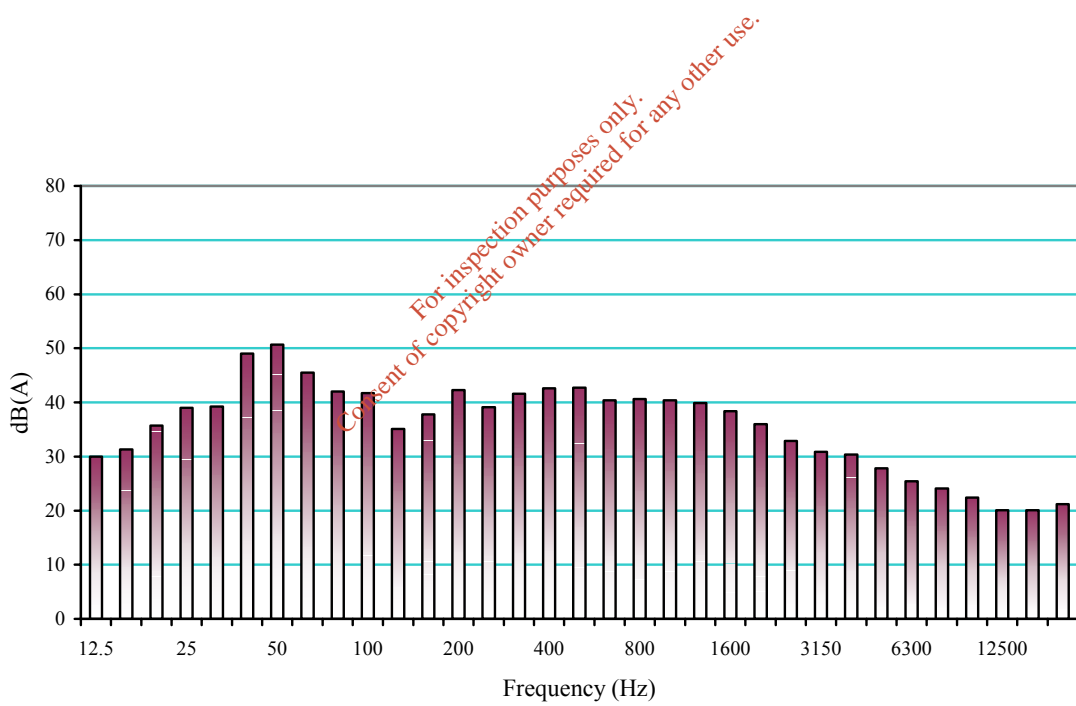


Figure 4 Night time Frequency Analysis at N2

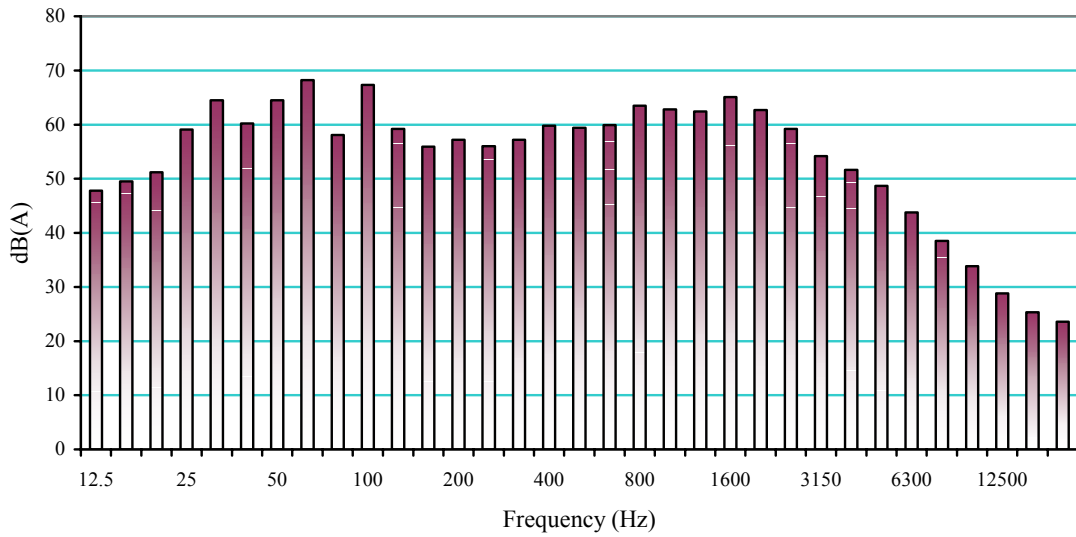


Figure 5 Daytime Frequency Analysis at N3

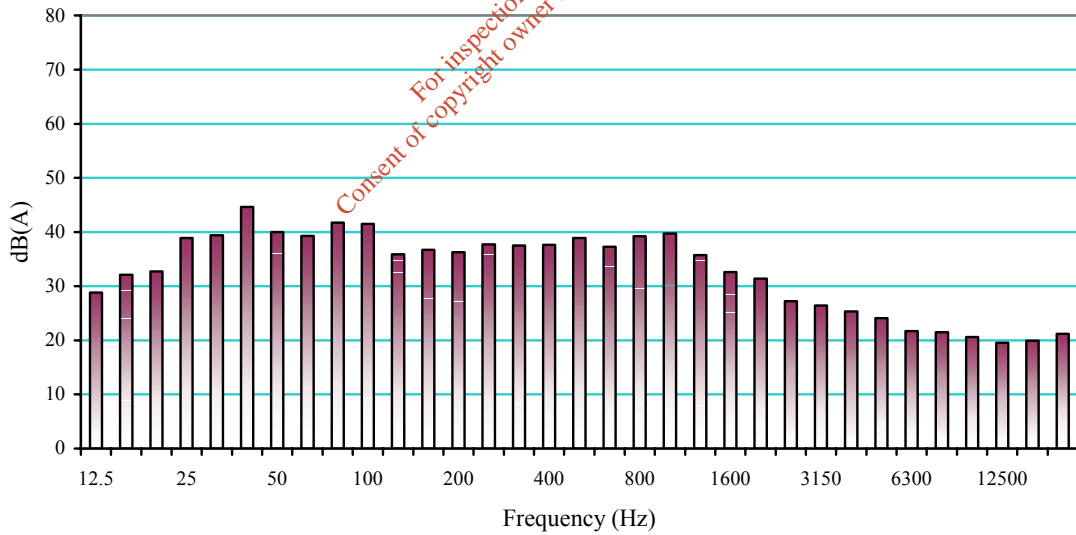


Figure 6 Night time Frequency Analysis at N3

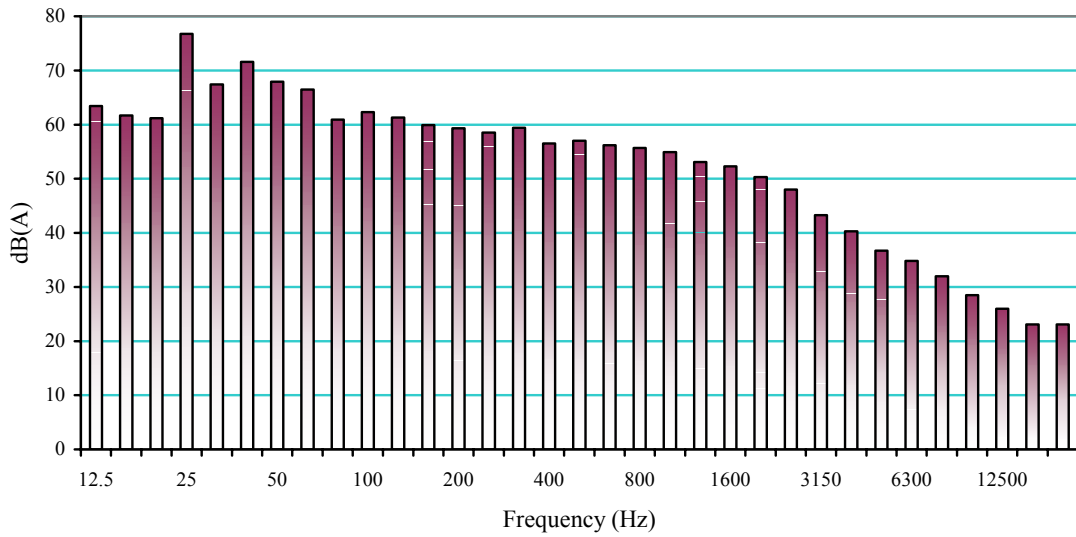


Figure 7 Daytime Frequency Analysis at N4

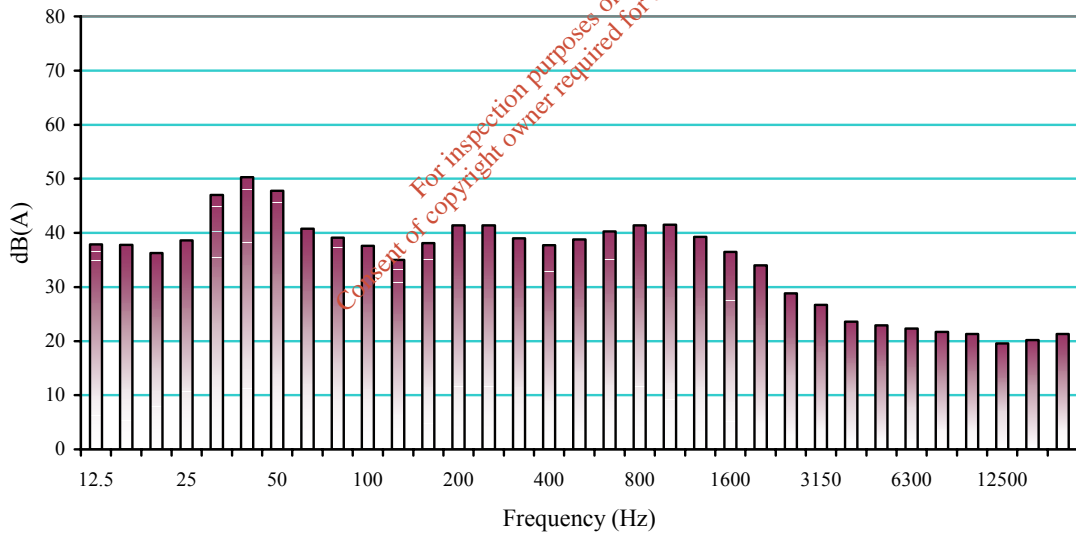


Figure 8 Night time Frequency Analysis at N4

APPENDIX D

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RILTA ENVIRONMENTAL Ltd.

ENVIRONMENTAL MANAGEMENT SYSTEM

ENVIRONMENTAL MANAGEMENT PLAN

ER-003

In accordance with
ISO 14001
ISO 9002

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**ENVIRONMENTAL MANAGEMENT PROGRAMME FOR THE
ACHIEVEMENT OF OBJECTIVES AND TARGETS**

EMP Ref.	Objective	Environmental Management Programme for the implementation of objectives.	Completion Date	Completed (Y/N)
1	Increase environmental awareness among RILTA staff.	Implement EMS and ERP training as part of employee induction. Develop and Issue Quarterly Environmental Bulletin for all staff/contractors	Jan 2008 Jan 2008	
2	Promote best practice in the processing of waste generated on site.	Insist on the appropriate segregation and (EWC) classification of wastes before they enter on site. Reduce skipped waste by 5% year on year Implement process waste audits to assist in waste minimization.	Ongoing March 2008 November 2007	

<i>Issue No.</i>	003	<i>Compiled by: Name/Position</i>	Colm Hussey Facility & Environmental Manager
<i>Date:</i>	March 2007	<i>Reviewed by: Name/Position</i>	Nick Beale Managing Director

EMP Ref.	Objective	Environmental Management Programme for the implementation of objectives.	Completion Date	Completed (Y/N)
3	Reduce fugitive emissions.	Annual monitoring of fugitive emissions. Carry out VOC/Odour survey Reduce usage of Xylene by 5%	Ongoing August 2007 February 2008	
4	Reduce levels of process waste sent to landfill.	Reduce waste ratio sent to landfill by 5% based on 2005 waste figures. Complete and log inspection of all general waste skips leaving site.	February 2008 June 2007	

<i>Issue No.</i>	003	<i>Compiled by: Name/Position</i>	Colm Hussey Facility & Environmental Manager
<i>Date:</i>	March 2007	<i>Reviewed by: Name/Position</i>	Nick Beale Managing Director

EMP Ref.	Objective	Environmental Management Programme for the implementation of objectives.	Completion Date	Completed (Y/N)
5	Improve site housekeeping.	<p>Insist that only fully and correctly labeled drums/IBCs are accepted on site.</p> <p>Train all relevant staff to undertake the daily site checks.</p> <p>Complete and log waste label checks as part of Sales Logix information system</p> <p>Remove backlog of IBCs outside Drum Division</p>	<p>Ongoing</p> <p>June 2007</p> <p>Oct 2007</p> <p>May 2007</p>	
6	Promote best practice for mixing incompatible wastes.	<p>Investigate new waste streams expected as part of the IBC reconditioning line and update 'Stop List' accordingly.</p> <p>Investigate if some of the waste IBC residues can be treated in the aqueous waste treatment system.</p>	<p>May 2007</p> <p>May 2007</p>	

<i>Issue No.</i>	003	<i>Compiled by: Name/Position</i>	Colm Hussey Facility & Environmental Manager
<i>Date:</i>	March 2007	<i>Reviewed by: Name/Position</i>	Nick Beale Managing Director

EMP Ref.	Objective	Environmental Management Programme for the implementation of objectives.	Completion Date	Completed (Y/N)
7	Reduce use of hazardous raw materials used on site.	Reduce amount of Xylene used on site by 5%	Jan 2008	
8	Optimize the quality of effluent discharged to sewer	Implement and document visual and grab sample tests for all effluent tanks released to sewer. Reassess acceptance of 10 no. waste streams as chosen by Colm Hussey & Colin Moore. Document and implement findings.	May 2007 September 2007	

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<i>Issue No.</i>	003	<i>Compiled by: Name/Position</i>	Colm Hussey Facility & Environmental Manager
<i>Date:</i>	March 2007	<i>Reviewed by: Name/Position</i>	Nick Beale Managing Director

EMP Ref.	Objective	Environmental Management Programme for the implementation of objectives.	Completion Date	Completed (Y/N)
9	Achieve consistent bund integrity and suitability.	Document and implement bund management procedure and create housekeeping procedure to monitor and clear site bund sumps. Create and document updateable bund testing record.	May 2007 May 2007	
10	Improve waste acceptance procedures	Furnish all new customers with the company's environmental policy along with all relevant licensing and permit regulation conditions as they apply to the customer. Create and implement a waste acceptance file to document faults in waste deliveries e.g. waste containers and labeling. Reassess asbestos acceptance procedures and furnish to all Rilta and 3 rd Party stakeholders	August 2008 Sept 2007 July 2007	

<i>Issue No.</i>	003	<i>Compiled by: Name/Position</i>	Colm Hussey Facility & Environmental Manager
<i>Date:</i>	March 2007	<i>Reviewed by: Name/Position</i>	Nick Beale Managing Director

EMP Ref.	Objective	Environmental Management Programme for the implementation of objectives.	Completion Date	Completed (Y/N)
11	To be a good and considerate neighbour.	<p>Complete noise monitoring.</p> <p>Review site landscaping project to enhance the visual aspect of the site.</p> <p>Implement and review RILTA housekeeping records.</p> <p>Monitor adjoining river on a yearly basis.</p> <p>Carry out VOC/Odour survey</p> <p>Reassess odour emissions on-site and implement findings.</p> <p>Maintain a 'complaints register' and review annually.</p>	<p>Ongoing</p> <p>Sept 2007</p> <p>May 2007</p> <p>Ongoing</p> <p>August 2007</p> <p>June 2007</p> <p>Ongoing</p>	

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<i>Issue No.</i>	003	<i>Compiled by: Name/Position</i>	Colm Hussey Facility & Environmental Manager
<i>Date:</i>	March 2007	<i>Reviewed by: Name/Position</i>	Nick Beale Managing Director

EMP Ref.	Objective	Environmental Management Programme for the implementation of objectives.	Completion Date	Completed (Y/N)
12	Improve fire safety on site.	Implement and assess fire evacuation drills on-site. Implement 'Emergency Response Procedure' training as part of staff induction. Reassess all alarm systems for effectiveness. Assess use of emergency lighting on site.	Ongoing June 2007 July 2007 October 2007	
13	Minimize energy usage on-site	Re-assess updated energy audit findings and implement accordingly <i>For inspection purposes only. Consent of copyright owner required for any other use.</i>	Oct 2007	

<i>Issue No.</i>	003	<i>Compiled by: Name/Position</i>	Colm Hussey Facility & Environmental Manager
<i>Date:</i>	March 2007	<i>Reviewed by: Name/Position</i>	Nick Beale Managing Director

APPENDIX E

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RILTA ENVIRONMENTAL Ltd.
ENVIRONMENTAL MANAGEMENT SYSTEM

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

In accordance with

ISO 14001:2004

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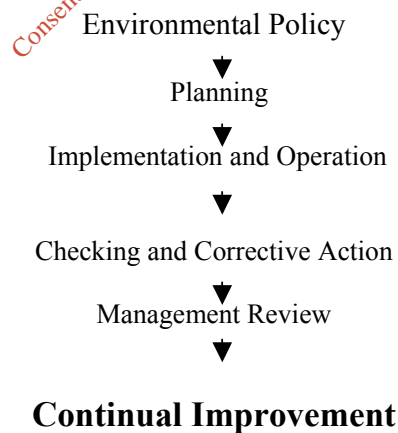
SCOPE

RILTA Environmental Ltd. is registered at Unit 402, Grants Drive, Greenogue Business Park, Rathcoole, County Dublin. RILTA Environmental operates an integrated waste management facility, combining hydrocarbon waste treatment, drum recycling and hazardous waste/contaminated soil storage. This EMS has been developed for implementation at the Greenogue facility.

The Facility Manager has responsibility for the day to day implementation and maintenance the EMS at the Greenogue facility. The Managing Director has overall responsibility for implementation of the EMS.

The purpose of this manual is to provide the core of RILTA's Environmental Management System (EMS). It summarises the key elements of the EMS and provides a signpost to all related documents and procedures. The EMS has been established and is maintained according to the requirements of EN ISO 14001:2004 as detailed in clause 4 of that standard. This manual is laid out in order to provide ease of cross reference to clause 4.

The Environmental Management System incorporates all departments of the business including Waste Treatment, Drum Recycling, Hazardous Waste Brokerage, Soils Environmental and Cullen Environmental. It details the risks and preventive actions specific to each department to provide for continual improvement for the facility as a whole. As per Clause 4 of the standard, continual improvement is achieved by fully developing, undertaking and auditing all documentation and procedures in the standard, starting from the Environmental Policy right through to the annual Management Reviews:



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DEFINITIONS

Environment - The surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation.

Environmental Aspect - The element of an organisations' activities, products or services that can interact with the environment. A significant environmental aspect is an environmental aspect that has or can have a significant environmental impact.

Environmental Impact - Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisations activities, products or services.

Environmental Management System (EMS) - The part of the overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.

Environmental Objective - Overall environmental goal, arising from the environmental policy, that an organisation sets itself to achieve, and which is quantified where practicable.

Environmental Policy - Statement by the organisation of its intentions and principles in relation to its overall environmental performance which provides a framework for action and for the setting of its environmental objectives & targets.

Environmental Target - Detailed performance requirement, quantified where practicable, applicable to the organisation or parts thereof, that arise from environmental objectives and that need to be set and met in order to achieve those objectives.

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RELATED DOCUMENTS

All environmental documentation is included on an index listing held on site by the Facility Manager. Documents of specific importance to this manual are as follows:

RILTA Environmental Waste Management Licence Application

RILTA Environmental Waste management Licence Reg no. 192-1.

- ER – 001 Register of Environmental Aspects
- ER – 002 Register of Objectives & Targets
- ER – 003 Environmental Management Programme
- ER - 004 Register of Legislation
- ER - 005 Procedures Manual

- EOP - 001 Environmental Aspects
- EOP - 002 Environmental Legislation
- EOP - 003 Objectives & Targets
- EOP - 004 Training, Awareness and Competence
- EOP - 005a Internal Communication
- EOP – 005b External Communication
- EOP – 005c Control of Suppliers/Contractors
- EOP – 005d Waste Pre-acceptance & Control
- EOP – 005e Waste tracking system
- EOP - 006 Document Control
- EOP - 007 a-n Operational Control
- EOP – 008c Waste Disposal
- EOP – 008d Sump Inspec
- EOP - 009a-e Emissions Monitoring
- EOP - 010 Spillage Procedure
- EOP - 011 Bund/Sump/Underground Pipe Testing
- EOP - 012 Emergency Preparedness & Response
- EOP - 013 Maintenance Programme
- EOP - 014 Non-Conformance and Corrective and Preventative Action
- EOP - 015 Environmental Records
- EOP - 016 Internal EMS Audits
- EOP - 017 Management Review

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ENVIRONMENTAL MANAGEMENT SYSTEM OVERVIEW

RILTA Environmental has established and maintains an Environmental Management System supported by appropriate organisation and procedures as specified in EN ISO 14001:2004.

In establishing this system, the main objectives were:

- 1 to develop an efficient and cost effective Environmental Management System which compliments the EPA Waste Management Licence,
- 2 to implement an EMS by reference to existing procedures and systems,
- 3 to achieve effective environmental risk management for the site, given the increasing amount of existing and future environmental legislation.
- 4 to demonstrate RILTA Environmental's commitment to continual improvement, waste minimisation and pollution prevention,
- 5 to provide a framework for establishing and reviewing site environmental targets and objectives.

The ISO 14001 EMS is based around a simple "Plan, Do, Check, Act" type management system ie.

1. Plan what we are going to do
2. Do it
3. Check that we have done what we planned to do
4. Review what we have done and act to improve
5. Go back to 1, with improvements in place.

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ENVIRONMENTAL MANAGEMENT SYSTEM OVERVIEW Contd.

The Environmental Policy Statement, along with the Environmental Aspects, Legal and Other Requirements, Objectives and Targets and the Environmental Management Programme make up the “Plan” part of the system (Sections 4.2 and 4.3 of this manual).

Structure and Responsibility, Training, Awareness and Competence, Communication, Documentation and Document Control, Operational Control and Emergency Preparedness and Response make up the “Do” part of the system.

Monitoring and Measurement, Non-Conformance and Corrective and Preventative Action, Records and the Audit System make up the “Check” part of the system (Section 4.5 of this manual).

Management Review achieves the “Act” part of the system (Section 4.6). This brings the system full circle in the performance of the management system back to planning in a time scale of one year and with resulting continuous improvement.

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ISO 14001 Section:	4.2
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ENVIRONMENTAL POLICY AND COMMITMENT

There is a commitment at the highest management level within RILTA Environmental to ensure the development, establishment and maintenance of this Environmental Management System. This commitment includes provision of the necessary resources to implement the System and sustain improvements.

The Environmental Policy Statement is communicated to all employees and is displayed in the reception foyer of the offices at Greenogue. Copies of the statement (see following page) are available upon request to the public, the media or to any other interested parties.

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ENVIRONMENTAL POLICY STATEMENT

RILTA Environmental (formerly SITA Environmental & Pipe & Drain Services) was established in 1978, the company is a market leader in providing environmental services to industrial and commercial clients. **RILTA Environmental** operates Ireland's largest Hazardous Waste Treatment Facility, EPA Waste Licence No. W192-1. **The Facility provides a Hydrocarbon Treatment and Recycling Facility, a Drum Reconditioning and Recycling Facility, a Hazardous Waste Transfer Station, and a Contaminated Soil Transfer Station.**

The site provides state of the art facilities for the handling, treatment and recycling of materials from a wide range of industrial sources.

RILTA Environmental operations have a positive environmental impact and help Irish industry to manage and reduce the potential to cause pollution. However, we are aware of the need to effectively manage and control our own emissions and reduce the potential to cause environmental pollution from our site and activities.

Consequently, **RILTA Environmental** regard environmental protection as an ongoing and essential part of our business. We will therefore take all reasonable steps to ensure that our operations do not have any negative impacts on the environment.

RILTA Environmental will strive to meet these commitments by: -

- ❖ Conforming to relevant environmental standards, licences and legislation relating to our business,
- ❖ Continually improving our operations by setting and reviewing environmental objectives and targets,
- ❖ Preventing pollution by monitoring and assessing our activities and emissions,
- ❖ Reducing the quantity of waste disposed of to landfill,
- ❖ Improving the quality of the effluent disposed of to sewer,
- ❖ Segregating and making wastes available for recycling,
- ❖ Communicating our environmental policy to all employees and ensuring that they have the knowledge, resources and authority to implement this policy,
- ❖ Ensuring that the proper managerial, technical and administrative controls shall operate in order to enable this policy to be maintained at all levels,
- ❖ Making our environmental policy available to the public and interested parties.

Whilst all **RILTA Environmental** employees have a duty to ensure that our operations do not cause environmental pollution, the overall responsibility for environmental protection lies with the Managing Director.

Signed: _____
Séamus A. Clancy, BE MSc MIEI
Managing Director
RILTA Environmental Ltd.

Date: _____

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PLANNING

This section looks at the way RILTA Environmental undertakes the planning stage of the EMS. This has been achieved by first undertaking environmental reviews of the sites and operations. This process allowed RILTA Environmental to identify and understand the environmental aspects of operations, and achieve comprehensive control over legal and other requirements.

Following production of the Register of Environmental Aspects (ER-001) and Register of Legal and Other Requirements (ER-004), according to procedures EOP-001 and 002, RILTA Environmental Ltd were able to establish Objectives & Targets for the site (ER-002) in order to improve the environmental aspects. The environmental management programme (ER-003) outlines the means and timeframes for completing the objectives and targets. The setting up of environmental objectives, targets and management programmes are detailed in procedure EOP-003.

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ENVIRONMENTAL ASPECTS

Independent Consultants carried out an Environmental Review at RILTA Environmental during April 1998. This review formed the basis of the original waste management licence application to the EPA. A similar review was undertaken in December 2004 on foot of EPA recommendations to reflect the changes involved with moving to the new site at Greenogue.

The review helped to identify the Environmental Aspects of the site, which formed part of the waste licence application. The conditions set down in the waste management licence, together with the compilation of the Aspects Register (ER-001) have been used to set the Objectives and Targets for the site (ER-002). The Aspects Register was compiled in accordance with EOP-001 and the Objectives and Targets Register was compiled in accordance with EOP-003

In compiling the Environmental Aspects Register the following issues were assessed;

- Emissions to air,
- Emissions to sewer,
- Emissions to Ground/Groundwater,
- Waste management,
- Use of raw materials and natural resources,
- Nuisances.
- Other local environmental and community issues.

The main Environmental Aspects of RILTA Environmental Ltd's operations are;

- Effluent discharges to sewer,
- Fugitive emissions to air,
- Sludge disposal to landfill,
- Potential ground water contamination,
- Potential discharges to the Griffeen River
- Site bunding and containment,
- Waste acceptance and handling procedures.

The Facility Manager or designee who receives information on potential new aspects as detailed in EOP-001, will keep the Aspects Register for the site up to date. Following twice yearly updates of the EMP, information on reduction of aspects significance will be added to the register.

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References

- ER-001 Register of Environmental Aspects
- ER-002 Register of Objectives & Targets
- EOP-001 Procedure to Identify Environmental Aspects
- EOP-003 Procedure to Set Objectives & Targets

RILTA Environmental Ltd Waste Management Licence Reg. No.192-1

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ISO 14001 Section:	4.3.2
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LEGAL AND OTHER REQUIREMENTS

The legal and other requirements relating to the site have been assessed. A list of relevant documents is detailed in the Register of Legislation (ER-004). This register is updated and maintained according to procedure EOP-002.

Key legislative documents are held on site by the Facility Manager. Any changes in legislative requirements, that have an effect on RILTA Environmental Ltd operations, are briefed by the Facility Manager to Management as required.

References

ER-004 Register of Legislation
EOP-002 Procedure for Updating Legal Register

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ISO 14001 Section: 4.3.3

OBJECTIVES AND TARGETS

RILTA Environmental have established and will maintain documented environmental objectives and targets (ER-002) which apply to all functions and levels within the organisation. These objectives and targets are based on the information outlined in the Aspects Register and as set out in the waste management licence 192-1

The setting and reviewing of these objectives and targets involves consideration of the site environmental aspects, legal and other requirements (eg. EPA requirements, legislation, waste licence), views of interested parties and technological, financial, operational and business requirements. The procedure for setting and reviewing objectives and targets is outlined in EOP-003.

The site objectives and targets are consistent with RILTA Environmental's commitment to continual improvement of the EMS as outlined in our Environmental Policy Statement i.e. the prevention of pollution, waste minimisation etc.

References

ER-002 Register of Objectives & Targets
EOP-003 Procedure for Setting and Reviewing Objectives and Targets

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ISO 14001 Section:	4.3.4
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ENVIRONMENTAL MANAGEMENT PROGRAMME

RILTA Environmental has established and will maintain programmes for achieving the environmental objectives and targets. The programme is detailed in ER-003. The programme includes the designation of responsibility, means and timeframes for achieving each of the objectives and targets.

New developments within RILTA Environmental and external developments affecting the site will be included in the EMP where relevant as detailed in procedures EOP-001 and EOP-003.

References

- ER-003 Register of the Environmental Management Program
- EOP-001 Procedure to Identify Environmental Aspects
- EOP-003 Procedure to Set and Review Environmental Objectives & Targets

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ISO 14001 Section:	4.4
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IMPLEMENTATION AND OPERATION

This section looks at the “Do” part of the EMS and defines the structure and responsibility for implementing the EMS. It details the training, awareness and competence which has been established with site personnel and outlines how relevant information on the EMS is communicated.

This section also deals with the control of EMS documentation and procedures to control operations associated with environmental aspects. Procedures to deal with emergency situations are also covered.

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ISO 14001 Section:	4.4.1
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STRUCTURE AND RESPONSIBILITY

RILTA Environmental has an established management and organisational structure in place. The organisational chart outlining the management structure of RILTA Environmental is included on page 17 of this manual. Specific roles and responsibilities of key employees regarding the EMS are summarised below.

Managing Director - overall responsibility for the EMS.

Operations Director – responsible for supervising the day-to-day implementation of the EMS.

Facility Manager – overall responsibility for the day-to-day implementation and maintenance of the EMS at Greenogue. Duties include organising sampling and monitoring of emissions in accordance with the waste license, ensuring that site staff is aware of the EMS and ensuring that appropriate environmental responsibilities are incorporated into an individuals job description.

Health & Safety Manager - responsible for overseeing and implementing health and safety issues at the site. Duties include co-ordinating health and safety training throughout the company, monitoring health and safety developments, liaising with Directors, interested parties and regulatory authorities.

Contracts Supervisor - responsible for ensuring that site procedures are correctly followed and implemented. Duties include reporting to the Facility Manager any potential problems which might cause pollution, liaising with the regulatory authorities, assisting the Facility Manager and Directors to implement and maintain the EMS at the site.

References

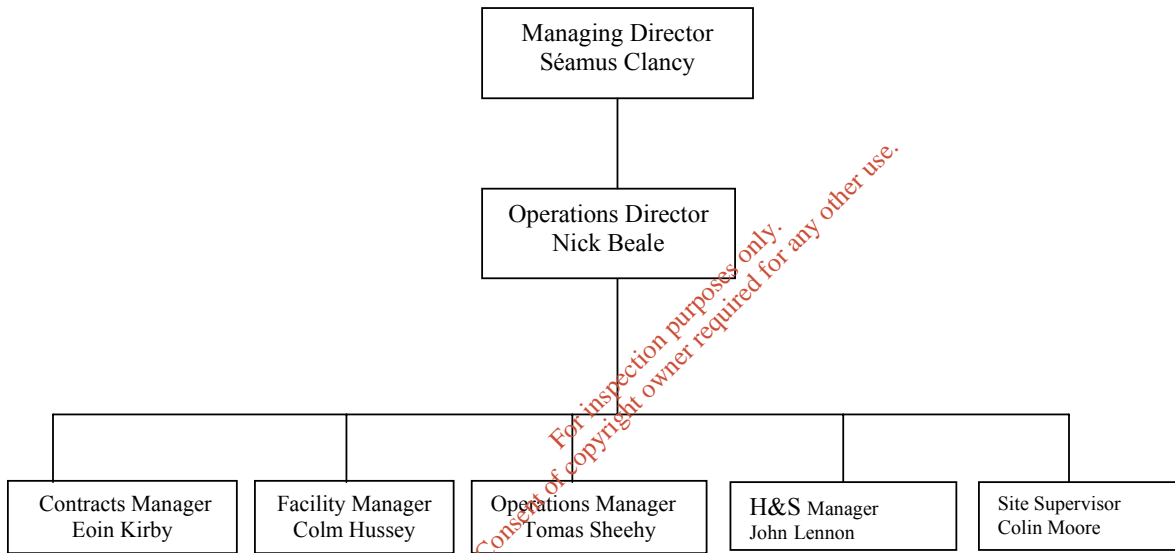
EOP 001-017 Management Responsibilities as set out in the Procedures
Attached Company Organisational Chart

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ISO 14001 Section: 4.4.1

RILTA Environmental Management Structure Chart



<i>Issue No.</i>	002	<i>Compiled by: Name/Position</i>	Colm Hussey Facility Manager
<i>Date:</i>	May 2006	<i>Reviewed by: Name/Position</i>	Nick Beale, Operations Director

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ISO 14001 Section: 4.4.2

TRAINING, AWARENESS AND COMPETENCE

It is the policy of RILTA Environment to identify the training needs and requirements of company personnel. All staff employed at the treatment facility will be given environmental awareness training while performing their duties. The training will be carried out by the facility manager and shall have regard to the specific tasks and the significance of their environmental impacts.

General Awareness Training shall comprise:

- Legal and Licence requirements
- The importance of conformance with the environmental policy, procedures and with the requirements of the EMS.
- The importance of individual roles and responsibilities within the EMS.
- The potential environmental impacts of work activities and the environmental benefits of improved personal performances.
- The potential consequences of departure from specified operating procedures.

The aim is that all personnel performing tasks which can cause significant environmental impacts, shall be competent on the basis of education, training and/or experience.

The Operations Director is responsible for the identification and planning of appropriate training for all staff, based on the recommendations of the Facility Manager. The Managing Director has overall responsibility to ensure that the training requirements are met.

A training procedure (EOP 004) has been implemented as part of this EMS. Training records for all relevant RILTA staff are maintained on-site. The Facility Manager maintains an individual Training Record (EFM 001b), a Register of Training Requirements (EFM 001a) and an Annual Training Schedule (EFM 001c) as part of an integrated training matrix. All training records will be kept for the duration of an individual's employment and for a period of not less than three years thereafter.

References

EOP 004	Procedure to identify and implement staff training
EFM 001a	Register of Training Requirements
EFM 001b	Individual Annual Training Record
EFM 001c	Annual Training Schedule

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<i>Date:</i>	May 2006	<i>Reviewed by:</i> <i>Name/Position</i>	Nick Beale, Operations Director

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ISO 14001 Section:	4.4.3
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COMMUNICATION

RILTA Environmental has implemented procedures (EOP-005a & EOP-005b) to communicate our environmental activities to our internal workforce and externally to interested parties.

Internal communications are facilitated through regular meetings, and the results of environmental monitoring, audits and EMS reviews are passed on to relevant personnel within the Company.

External communications are facilitated through regular reporting to the EPA and through a public information file which is kept by the Facility Manager on site and made available to inspection by the public on request. A copy and record of all reports sent to the EPA is maintained in the operations building by the Facility Manager.

RILTA Environmental is conscious of the need for good internal and external communication in order to motivate the workforce, inform and educate the public and ensure the sustainability of our EMS. RILTA Environmental has stated in our Environmental Policy a commitment to 'have open communication with public authorities and members of the public'.

RILTA Environmental will send questionnaires to suppliers and customers to enquire about their environmental performance and management plans.

References

EOP-005a	Procedure for Internal Environmental Communications
EOP-005b	Procedure for External Environmental Communications
EFM-002a	EPA Recurring Reports
EFM-002b	EPA Once-Off Reports
EFM-003	Environmental Complaint/Incident Form
EFM-021a	Non Conformance Report
EFM-021b	Non Conformance Register

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<i>Date:</i>	May 2006	<i>Reviewed by: Name/Position</i>	Nick Beale, Operations Director

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EMS DOCUMENTATION

This environmental management manual has been written in order to provide a description of the core of RILTA Environmental EMS and the interactions within that system. It is laid out as a 'signpost' to provide direction to other documentation which provides detail as to the running of the environmental management system.

This manual and other environmental documents are available for consultation internally within RILTA Environmental and are held within central files by the Facility Manager.

Other EMS documentation is referenced as follows and is listed in a maintained index held by the Facility manager on site.

EOP-*.*	-	Environmental Operating Procedure
EFM-*.*	-	Environmental Form
ER-*.*	-	Environmental Record

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<i>Issue No.</i>	002	<i>Compiled by:</i> <i>Name/Position</i>	Colm Hussey Facility Manager
<i>Date:</i>	May 2006	<i>Reviewed by:</i> <i>Name/Position</i>	Nick Beale, Operations Director

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DOCUMENT CONTROL

RILTA Environmental has implemented and will maintain a document control procedure (EOP-006) as part of this EMS. This procedure will ensure that all documents required by the EMS are controlled and reviewed so that:

1. They can be located and are available at key locations.
2. They are reviewed at least yearly, revised as necessary and approved by authorised personnel.
3. They are current. Any obsolete documents will be removed from work areas and assured against unintended use.
4. All relevant documentation, particularly environmental records are retained for the appropriate periods.

All documents will be legible, dated, identified and maintained in an orderly manner. The Operations Director is responsible for authorising documents within the EMS unless otherwise specified. The Environmental Operating Procedures (EOP's) shall be authorised by the Facility Manager and the Operations Director.

References

EOP 006 Document Control, Review & Amendment Procedure
 Obsolete Master Copy File

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<i>Date:</i>	May 2006	<i>Reviewed by: Name/Position</i>	Nick Beale, Operations Director

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ISO 14001 Section:	4.4.6
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OPERATIONAL CONTROL

RILTA Environmental has identified operations and activities that are associated with significant environmental aspects (EOP-001, ER-001). Objectives and targets (ER-002) have been set for these aspects and RILTA Environmental Ltd will ensure that such operations and activities shall be carried out in order to reduce significant aspects.

This will be achieved by:

1. Establishing and maintaining documented procedures to cover situations where their absence could lead to deviation from the sites policy and objectives and targets.
2. Monitoring or verifying outputs from the activity.
3. Carrying out corrective action in the event of a breach of performance or operational control limits.

The relevant operational controls for each Environmental Aspect (ER-001) are detailed in the Environmental Procedures Manual (ER-005).

References

EOP-001	Procedure for Establishing Environmental Aspects
ER-001	Register of Environmental Aspects
ER-002	Register of Environmental Objectives and Targets
ER-005	Procedures Manual

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ISO 14001 Section: 4.4.7

EMERGENCY PREPAREDNESS AND RESPONSE

RILTA Environmental has established and will maintain emergency response procedures (EOP-010 & EOP-012).

RILTA Environmental will review and revise, where necessary, the emergency preparedness and response procedures, in particular after the occurrence of an accident or emergency situation.

Testing of emergency procedures shall be undertaken on a regular basis.

References

- EOP-010 Spillage Procedure
- EOP-012 Emergency Response Procedure

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ISO 14001 Section:	4.5
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CHECKING AND CORRECTIVE ACTION

This section deals with the 'check' element of the Plan, Do, Check, Act system. Checking is important to assess whether RILTA Environmental is doing what we planed to do, and implement corrective and preventive action where non-conformance's with the plans are occurring. In order to be able to check that plans are being carried out, it is necessary to have established monitoring, measuring and recording schemes. This information will to provide the means to gauge whether RILTA Environmental is achieving the results which we have committed to achieve.

Records shall be kept of all measurements, audits, investigations and corrective actions as well as other records such as training records and external communications.

Internal auditing is a major part of the checking element and is undertaken in order to determine whether the EMS has been properly implemented, maintained and conforms to the plans and requirements of EN ISO 14001:2004.

Record keeping and monitoring provides a means to demonstrate sustained improvements and provide feedback to management regarding the effectiveness of the EMS.

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<i>Date:</i>	May 2006	<i>Reviewed by: Name/Position</i>	Nick Beale, Operations Director

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ISO 14001 Section: 4.5.1

MONITORING AND MEASURING

RILTA Environmental has established and will maintain documented procedures to regularly monitor and measure key environmental aspects and licence requirements (EOP-007a to EOP-009e). The results of monitoring and measurement activities will be used to track performance, relevant operational controls and conformance with the site environmental objectives and targets and where relevant, environmental legislation and regulations.

References

EOP 007a	Liquid Waste Acceptance
EOP 007b	Liquid Waste Sampling/Testing/Analysis
EOP 007c	Liquid Waste Handling
EOP 007d	Liquid Waste/Chemical Storage
EOP 007e	Water Treatment
EOP 007f	Treated Effluent Discharge
EOP 007g	Oil Treatment
EOP 007h	Sludge Treatment
EOP 007j	Soil Acceptance/Handling & Storage
EOP 008a	Steel & Plastic Drum Disposal
EOP 008b	Ink Cartridge Waste Disposal
EOP 008c	General Waste Disposal
EOP 008d	Settlement Tank/Interceptor Sump Inspection
EOP 008e	Ink Sump Inspection
EOP 009a	Air Emissions Monitoring
EOP 009b	Sewer Discharge Monitoring
EOP 009c	Groundwater Monitoring
EOP 009d	Noise Monitoring
EOP 009e	Nuisance Monitoring
EOP 008f	Hazardous Waste Disposal

EFM 004- EFM020c Monitoring Record Forms

<i>Issue No.</i>	002	<i>Compiled by:</i> <i>Name/Position</i>	Colm Hussey Facility Manager
<i>Date:</i>	May 2006	<i>Reviewed by:</i> <i>Name/Position</i>	Nick Beale, Operations Director

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ISO 14001 Section:	4.5.2
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NON-CONFORMANCE AND CORRECTIVE AND PREVENTATIVE ACTION

RILTA Environmental has established and will maintain a procedure (EOP 014) for implementing corrective and preventive action as part of this EMS.

Corrective and preventive actions taken to eliminate the causes of actual and potential non-conformance's will be appropriate to the magnitude of problems and commensurate with the environmental impact encountered.

Any changes to documented procedures resulting from corrective action shall be implemented and recorded.

References

EOP 014	Non-Conformance & Corrective Action Procedure
EFM 021a	Non-Conformance Report
EFM 021b	Non-Conformance Register

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RECORDS

RILTA Environmental has established and will maintain a procedure (EOP-015) for the identification, maintenance, storage and disposition of environmental records as part of our EMS.

All environmental procedures contain the prefix EOP-***

All environmental reports contain the prefix ER-**

All environmental recording forms contain the prefix EFM- **

A number of environmental recording forms eg. incoming liquid waste, waste disposal forms etc are the same as those developed for the existing site management system. These record forms will continue to be used and stored in the EMS files which are held in the site Facility building.

All records will be legible, identifiable and traceable to the activity, product or service. Storage is such that records are readily retrievable and protected against damage, deterioration and loss.

All environmental records shall be kept on site as required by Conditions 10.1 of the EPA waste licence.

Records to be held shall be appropriate to the site EMS, Waste Licence and demonstrate conformance to the requirements of EN ISO 14001.

References

EOP-015	Procedure to Control Environmental Records
ER-***	Environmental Reports
EOP-**	Environmental Operating Procedures
EFM-**	Environmental Recording Form

<i>Issue No.</i>	002	<i>Compiled by: Name/Position</i>	Colm Hussey Facility Manager
<i>Date:</i>	May 2006	<i>Reviewed by: Name/Position</i>	Nick Beale, Operations Director

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ISO 14001 Section:	4.5.4
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ENVIRONMENTAL AUDITS

RILTA Environmental has established and will maintain a procedure (EOP 016) and programme (EFM 022), for carrying out periodic internal audits of the EMS. This procedure will ensure that internal audits will be carried out to determine the effectiveness of the EMS and to ensure compliance with ISO 14001.

The EMS audit programme and schedule is based on the environmental importance of activities to be audited and on the results of any previous audits. The EMS audit schedule is shown on EFM 022. The internal EMS audit procedure (EOP-016) details the scope, frequency and methodology of audits as well as responsibilities and requirements for conducting audits and reporting results.

Environmental audits will be of two types;

1. monthly internal audits of specified parts of the EMS to ensure its effectiveness,
2. yearly intensive EMS audit involving external personnel to ensure compliance with ISO 14001.

This combined approach should ensure the continued improvement of environmental performance and the EMS.

References

EOP 016	Procedure to Set/Conduct Internal EMS Audits
EFM 022	Internal EMS Audit Schedule
EFM 023	Internal EMS Audit Report

<i>Issue No.</i>	002	<i>Compiled by:</i> <i>Name/Position</i>	Colm Hussey Facility Manager
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ISO 14001 Section:	4.6
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MANAGEMENT REVIEW

RILTA Environmental's senior staff will review the EMS on a yearly basis to ensure its continuing suitability, adequacy and effectiveness (EOP 017). The Operations Director shall ensure the collection of the necessary information to allow the management board to carry out this evaluation.

The review will address any needs for changes to policy, objectives and targets and other elements of the EMS which may have become apparent from audits, changing circumstances at the site and the commitment to continual improvement.

The Managing Director shall have responsibility for advancing specific recommendations for actions to upgrade or modify the EMS following each annual review. The Operations Director will schedule and supervise implementation of any recommendations for upgrading or modifying the EMS.

The review will be documented in the form of minutes of the meeting and the report of the Operations Director.

References

EFM 024a	EMS Meeting Agenda
EOP 017	EMS Management Review
EFM 024	EMS Meeting/Agenda Record
EFM 025	EMS Meeting Minutes

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<i>Date:</i>	May 2006	<i>Reviewed by:</i> <i>Name/Position</i>	Nick Beale, Operations Director

APPENDIX F

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Industrial Temperature Sensors Ltd.

Unit 18, Nass Industrial Estate, Naas, Co. Kildare

Tel: 045-898164 Fax: 045-896521 Web: www.itsirl.com email: info@itsirl.com



CERTIFICATE OF CALIBRATION

Certificate No: C207097/C1

Customer: Rilta Enviromental

Order No.:553

Instrument: Resistance Thermometer Insert & Tx's

Model:PR5331B3B1

Serial:970249650

Range: 0+100C

Test Equipment:

(1) AMETEK DTI 1000 S/N. 013.02-01-950702 CERT No. N1154335T
AMETEK PT100 S/N. 515361-01 CERT No. N1154335T

(2) AMETEK Macal mA LOOP CALIBRATOR
S/N. 008653-00239 CERT No. 54789

REFERENCE TEMPERATURE	INSTRUMENT READING	
	MA	ERROR MA
DEGREE C		
0.003C	4.005	0.005
49.974C	12.004	0.004
99.961	20.02	0.02

TESTED BY: STEPHEN RALPH

DATE: 12/02/07

A handwritten signature in black ink, appearing to read 'Stephen Ralph', is written over a horizontal line.

Industrial Temperature Sensors Ltd.

Unit 18, Nass Industrial Estate, Naas, Co. Kildare

Tel: 045-898164 Fax: 045-896521 Web: www.itsirl.com email: info@itsirl.com



CERTIFICATE OF CALIBRATION

Certificate No: C207097/C2

Customer: Rilta Environmental

Order No.:553

Instrument: Resistance Thermometer Insert & Tx's

Model: PR5331B3B1

Serial: 970249643

Range: 0+100C

Test Equipment:

(1) AMETEK DTI 1000 S/N. 013.02-01-950702 CERT No. N1154335T
AMETEK PT100 S/N. 515361-01 CERT No. N1154335T

(2) AMETEK Macal mA LOOP CALIBRATOR
S/N. 008653-00239 CERT No. 54789

REFERENCE TEMPERATURE	INSTRUMENT READING	
	MA	ERROR MA
DEGREE C		
0.003C	3.996	-0.004
49.974C	12.00	0
99.961	20.015	0.015

TESTED BY: STEPHEN RALPH

DATE: 12/02/07

Stephen Ralph

APPENDIX G

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CLIENT

No 18810

Concord Boiler Engineering Limited

Industrial Boiler & Mechanical Engineering Specialists

Marrowbone House
Marrowbone Lane
Dublin 8

Phone 453 2727 / 8 / 9 & 453 2566

Fax 453 3849

e-mail info@concord.ie

ENG. NAME / CODE <i>San Neagh</i> CODE	JOB No
INVOICE TO (BLOCK LETTERS) <i>Reatha Gas Ltd.</i>	SITE (BLOCK LETTERS)

DATES	% COMPLETE	SITE HOURS	TRAVEL HOURS	MILEAGE	MILEAGE RATE		
<i>Mon 4/1/07</i>		<i>3.5</i>	<i>1</i>				

BOILER No <i>Luton</i>	TYPE	BREAK DOWN	LABOUR
------------------------	------	------------	--------

REPORT

Isolated water gauge glasses and dropped pressure. Removed glasses and joints (2 bolts removed and tensioned out). Collected glasses. Fitted same with new joints. Fired up and brought to pressure. Left on line.

Combustion checked 3.5% O₂ CO approx. Efficiency 80%

QTY	DESCRIPTION	CARRIAGE		
		FOC	CAT No.	PRICE
<i>2</i>	<i>B6 Water gauge glasses</i>			
<i>4</i>	<i>B6 joints</i>			

CLIENTS SIGNATURE 	MAT / LAB
	VAT
	TOTAL €

TERMS: 30 DAYS NETT ORDER NO:

Attachment B.4.

All details of effluent discharge are included in the current waste licence –192-1. The body controlling effluent discharge is South Dublin County Council.

Attachment B.5.**Nature of the facility or premises concerned, including the proposed capacity of the facility or premises:**

The facility is currently operating as an Integrated Waste Management Facility. The current capacity of waste throughput at the facility is 65,000 tonnes per year. It is proposed that this volume will be increased to 111,000 tonnes per year. The proposed increase in waste will be comprised of an increase in the volume of contaminated soil transferred into and off site, with no processing or treatment on site. A planning application and accompanying Environmental Impact Statement have been forwarded to South Dublin County Council for the proposed increase in annual waste volume. Validation Reference No.: SD07A-0260.

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Attachment B.6.

The Newspaper Notice (one full paper and 4 pages, one for each copy and one for original).

The Site Notice.

Drawing showing it's location on site.

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SITE NOTICE

APPLICATION TO THE ENVIRONMENTAL PROTECTION AGENCY FOR THE REVIEW OF A WASTE LICENCE

RILTA Environmental Ltd., 151 Thomas Street, Dublin 8 will apply to the Environmental Protection Agency (EPA), Johnstown Castle Estate, County Wexford, for a review of the conditions of Waste Licence 192-1 for the Integrated Waste Management Facility located at Block 402, Greenogue Business Park, Greenogue, Rathcoole, County Dublin (Grid Reference E301579 N228431).

It is proposed that the waste licence is reviewed to increase annual tonnage at the site to 111,000 tonnes per annum, review air emission thresholds, review Eff2 parameter thresholds and to rename the licence to reflect the name change at the facility. The classes of activity concerned are specified in the Third and Fourth Schedules of the Waste Management Act, 1996, as follows:-

The Principal activity to be carried out on the site is: Class 13 of the Fourth Schedule of the Waste Management Act (1996):

"Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced." The facility is also covered under the following classes of activity:

Third Schedule:

Class 7, Class 11, Class 12, Class 13.

Fourth Schedule:

Class 2, Class 3, Class 4, Class 5, Class 6, Class 8, Class 13.

An Environmental Impact Statement (EIS) has been submitted with this application to the EPA. The application for the review of the waste licence, the accompanying Environmental Impact Statement and such further information relating to the application as may be furnished to the Agency in the course of the Agency's consideration of the Application, will, as soon as is practicable after receipt by the Agency, be available for inspection or purchase, at the EPA Headquarters, Johnstown Castle Estate, County Wexford.

Signed: _____

**Siobhán Tinnelly, TOBIN Consulting Engineers, Block 10-3,
Blanchardstown Corporate Park, Dublin 15 on behalf of RILTA
Environmental Ltd.**

Date of erection of site notice: 1st June 2007

Attachment B.7.**Activity 13 of the Fourth Schedule of Waste Management Acts 1996-2003**

The principal activity on site at Rilta Environmental is that of *'the storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced'*.

Rilta Environmental Ltd. operates a significant brokerage service whereby wastes are collected and stored on-site before being exported to suitable sites in the EU for recovery. The waste streams involved include:

- Contaminated Soil
- Acidic and Alkali wastes
- Flammable Wastes
- Laboratory Chemicals
- Photographic Wastes
- Environmentally Hazardous Wastes

Activity 7 of the Third Schedule of Waste Management Acts 1996-2003

This involves the use of both physical (settlement) and chemical (Ferric Alum Sulphate, Caustic Soda & Polyelectrolite) treatments to take hydrocarbons and suspended solids out of solution to allow for the treated effluent to be sent to foul sewer.

Activity 11 of the Third Schedule of Waste Management Acts 1996-2003

This refers to the mixing of wastes (both aqueous and sludges) to make treatment disposal more efficient and environmentally friendly.

Activity 12 of the Third Schedule of Waste Management Acts 1996-2003

May refer to a number of waste processes on site to ensure safe storage and processing of waste streams.

Activity 13 of the Third Schedule of Waste Management Acts 1996-2003

This applies almost exclusively to the storage and disposal of asbestos waste.

Activity 2 of the Fourth Schedule of Waste Management Acts 1996-2003

This activity relates to the storage and processing of contaminated soil.

Activity 3 of the Fourth Schedule of Waste Management Acts 1996-2003

This involves the recycling and reconditioning of steel drums.

Activity 4 of the Fourth Schedule of Waste Management Acts 1996-2003

This involves the recycling of plastic drums.

Activity 5 of the Fourth Schedule of Waste Management Acts 1996-2003

This activity relates to the neutralisation of acidic and alkali wastes

Activity 6 of the Fourth Schedule of Waste Management Acts 1996-2003

This activity relates to the recycling of pollution abatement material such as booms.

Activity 8 of the Fourth Schedule of Waste Management Acts 1996-2003

This activity involves the filtering and dewatering of oil to make it acceptable for reuse.

Attachment B.7. (a)

Quantity and Nature of the waste or wastes which will be treated, recovered or disposed of:

Refer to Section 2.2 Volume II of the Environmental Impact Statement (EIS).

Attachment B.8.

Raw Materials and Energy

Refer to Section 2.4.3 Volume II of the Environmental Impact Statement (EIS).

Attachment B.9.

Plant, Methods, Processes, Ancillary processes, Abatement, Recovery and Treatment Systems and operating procedures for the activity:

Refer to Section 2.3 Volume II of the Environmental Impact Statement (EIS).

Attachment B.10.

40 (4) (a)-(g)

- (a) A waste licence, No. 192-1, is currently active at the RILTA facility and all emissions that exceed the individual parameter thresholds are reported to the EPA.
- (b) Routine monitoring and operations are carried out in accordance with the conditions of the current waste licence, No. 192-1.
- (bb)N/A
- (c) RILTA aim at all times to use best available techniques to prevent or eliminate or, where it is not practicable, to limit, abate or reduce an emission from the activity concerned.
- (cc) The activities concerned are consistent with the objectives of the National Waste Management Policy, National Hazardous Waste Management Plan and the Dublin Waste Management Plan 2005-2010 as described in Chapter 3 of the EIS.
- (d) The facility currently holds a waste licence and the Directors and management responsible for this waste licence are “fit and proper” as described in Section C and Section L of this Waste Licence Application.
- (e) The applicant has complied with any requirements under Section 53.
- (f) Energy will continue to be used efficiently in the carrying on of operations at the facility. Energy use for 2006 is discussed in Section G and Attachment G herein.
- (g) Routine noise monitoring is included in the conditions of the current waste licence. In addition, impacts on noise based on the proposed increase in tonnage are described in Section 9 of the EIS. It was reported, following a detailed traffic and noise predictive assessment, that the increase in noise due to an increase in waste throughput at the facility will be insignificant.

Attachment B.11.

Source, location, nature, composition, quantity, level and rate of emissions arising from the activity and where relevant, the period or periods during which such emissions are made or are to be made:

Refer to Table E.1(ii) –Annex - Main Emissions to Atmosphere.

Attachment B.12.

Details, and an assessment of the effects, of any existing or proposed emissions on the environment, including any environmental medium other than those into which the emissions are, or are to be made, and of proposed measures to prevent or eliminate or, where that is not practicable, to limit or abate such emissions:

Refer to existing Waste Licence 192-1 in Attachment B.3. and the Annual Environmental Report (Jan-Dec 2006) in Attachment B.3.

Attachment B.13.

Identify monitoring and sampling points and indicate proposed arrangements for the monitoring of emissions and the environmental consequences of any such emissions:

Refer to existing Waste Licence 192-1 in Attachment B.3. and the Annual Environmental Report (Jan-Dec 2006) in Attachment B.3. Refer to Figure 7.1 of the Environmental Impact Statement for the location of monitoring points.

Attachment B.14.

Describe any proposed arrangements for the prevention, minimisation and recovery of waste arising from the activity concerned:

Refer to Chapter 2 of the Environmental Impact Statement. In particular, Section 2.6, Section 2.7 and Section 2.8.

Attachment B.15.

Describe any proposed arrangements for the off-site treatment or disposal of solid or liquid wastes:

Refer to Section 2.3.2 and Section 2.4. of the Environmental Impact Statement. Foul water from the facility is sampled prior to discharge to the sewer and is discharged in accordance with the conditions of the waste licence as issued by the EPA.

Attachment B.16.

Describe the existing or proposed measures, including emergency procedures, to prevent unauthorised or unexpected emissions and minimise the impact on the environment of any such emission:

Refer to Section 2 of the Environmental Impact Statement. In particular, refer to Section 2.4.7 and Section 2.7.5 for details of emergency procedures in the event of an accidental spillage on site. Ongoing environmental monitoring of all parameters on site ensures that unexpected emissions are recorded on site and reported to the EPA, as described in Section 2.8 of the Environmental Impact Statement.

Attachment B.17.

Describe the proposed measures for the closure, restoration, remediation or aftercare of the facility concerned, after the cessation of the activity in question:

Refer to Section 2.8.4 and 2.8.5 of the Environmental Impact Statement.

Attachment B.18.

State whether the activity is for the purposes of an establishment to which the European Communities (Control of Major Accident Hazards involving Dangerous Substances) Regulations, 2000 (S.I. No. 476 of 2000) apply:

The European Communities (Control of Major Accident Hazards involving Dangerous Substances) Regulations, 2000 do not apply.

Attachment B.19.

Refer to Chapter 2 of the EIS describing all operations and practices at the facility. A waste licence is also operational at the facility -Licence No. 192-1.

Attachment B.20

Refer to the Non-Technical Summary above –Attachment A. In addition, refer to Chapter 2 of the EIS for details of operational practices at the facility.

Attachment B.21.

A copy of the notice given to a local planning under article 9:

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Mr Tim O'Shea
South Dublin C.C.
Deansrath House
New Nangor Road
Clondalkin
Dublin 22

March 26th 2007,

Re: Rilta Environmental Ltd. Waste Licence W0192-01

Dear Tim,

Subsequent to our telephone conversation in February, I am writing to seek approval for a change to our Waste Licence. Our Licence may be viewed using the reference above at www.epa.ie.

To give you perspective, as part of our licensed site activities, we operate a waste water treatment system which uses both physical and chemical treatments. The types of wastes we accept include garage interceptors, waste oils, waste coolants and machining emulsions etc. Our final effluent product is tested for a number of parameters, two of those being C.O.D. and B.O.D. These are sampled on a grab sample basis and results have exceeded our current limits on a small number of occasions. It was suggested by the EPA that an increase in 'grab sample' limits would be preferable to putting in a biological treatment system (a potential odour source) as long as we did not breach the Licence 'daily mean loading' limits.

To put this in context, I include a table below with data taken from our Annual Environmental Report for 2006:

Total effluent sent to foul sewer: 17,990m³ over 243 days.

	Grab Sample Limit (mg/l)	Grab Sample Average 2006 (mg/l)	Daily Mean Load Limit (Kg)	Daily Mean Load Average 2006 (mg/l)
B.O.D.	1,000	735	160	54.39
C.O.D.	3,000	1492	480	111.41

As you can see, our data shows we are operating significantly below the daily mean loading limit and we would not see this figure increasing significantly as the total effluent released last year rose significantly but we would not envisage a similar increase this year or for the foreseeable future.

After reviewing similar Licences in the area, we would suggest revising the grab sample limits up to similar levels i.e. B.O.D. 3,000mg/l and C.O.D. 6,000mg/l. These, we feel would be more suitable to the waste types we accept here for treatment. We intend to apply for a review of our current Licence in the near future and would hope to put in the changes to effluent limits as part of the review.

If you wish to contact me for further information, you can reach me at 087 9176264. I look forward to hearing from you.

Yours sincerely,

Colm Hussey

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Attachment B.22.

A copy of such plans (appropriately scaled and no larger than A3 size), including a site plan or plans and location map or maps, and such other particulars, reports and supporting documentation as are necessary to identify and describe, as appropriate -the position of the notice in accordance with article 7:

Refer to Drawing 3684-01-201 of the Environmental Impact Statement.

Attachment B.23.

A copy of such plans (appropriately scaled and no larger than A3 size), including a site plan or plans and location map or maps, and such other particulars, reports and supporting documentation as are necessary to identify and describe, as appropriate - the point or points from which emissions are made or are to be made:

Refer to Figure 7.1 of the Environmental Impact Statement.

Attachment B.24.

A copy of such plans (appropriately scaled and no larger than A3 size), including a site plan or plans and location map or maps, and such other particulars, reports and supporting documentation as are necessary to identify and describe, as appropriate -the point or points at which monitoring and sampling are undertaken or are to be undertaken:

Refer to Figure 7.1 of the Environmental Impact Statement.

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Section C:

Attachment C.1.

Managing Director – Nick Beale

Nick Beale is the MD of Rilta Environmental Ltd. and has overall responsibility for the running of the company. Mr. Beale has a Degree in Engineering and has completed a number of modules of the FAS waste management course and has two years experience in waste management as well as many years experience in similar fields.

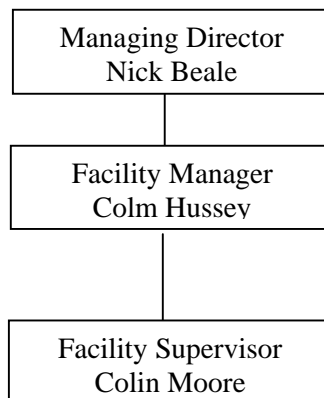
Facility Manager - Colm Hussey

Colm Hussey is the Facility Manager at Rilta Environmental's Greenogue site and has overall responsibility for the day to day operation of site activities. He is also responsible for all environmental matters and for the operation of the ISO14001 and ISO9002 systems. Mr. Hussey has a Degree in Geology and a Master's Degree in Environmental Geochemistry. Mr. Hussey has also completed the FAS waste management course and has seven years experience in the field of waste management.

Facility Supervisor – Colin Moore

Colin Moore is the site supervisor and is responsible for the day to day running of the treatment, brokerage and soil divisions. Mr Moore has completed a number of relevant training modules and has 15 years experience in waste management (in his current role).

RILTA Environmental Management Structure Chart



Attachment C.2.

A copy of the Environmental Management System (EMS) is included in Appendix E of the AER.

Attachment C 3:**Details of hours of operation for the waste facility:**

- (a) Proposed hours of operation –Same as the current operational hours as stated in the EIS in Section 2.4.2.
- (b) Proposed hours of waste acceptance/handling - Same as the current operational hours as stated in the EIS in Section 2.4.2.
- (c) Proposed hours of any construction and development works at the facility and timeframes (required for landfill facilities): N/A
- (d) Any other relevant hours of operation expected: N/A.

Section D**Attachment D.1.**

Refer to EIS and accompanying Drawings as included in B3.

Attachment D.2.**Describe the plant, methods, processes and operations of the waste facility:**

Refer to Section 2.3 and Section 2.4 of the Environmental Impact Statement.

Section E:**Attachment E.1**

Emissions to Atmosphere
See Tables in Section E of Annex 1.

Attachment E.2

Emissions to Surface Waters
Attachment E.2 Tables E.2(i) and E.2(ii).

Attachment E.3

Emissions to Sewer

Attachment E.3 Tables E.3(i) and E.3(ii).

Attachment E.4

Emissions to Groundwater

Table E.4(i). Not Applicable.

Attachment E.5**Noise Emissions**

Refer to Environmental Monitoring Location Map, Figure 7.1, EIS. Details of source, nature and level are included in the AER, Attachment B3. Conditions are included in the Waste Licence 192-1, also included in Attachment B3.

Attachment E.6**Environmental Nuisances****Bird Control**

Refer to Section 2.6.2 of the Environmental Impact Statement.

Dust Control

Refer to Section 8.7 of the Environmental Impact Statement.

Fire Control

Refer to Section 2.6.5 of the Environmental Impact Statement.

Litter Control

Refer to Section 2.6.3 of the Environmental Impact Statement.

Traffic Control

Refer to Section 2.6.6 of the Environmental Impact Statement.

Vermin Control

Refer to Section 2.6.4 of the Environmental Impact Statement.

Road Cleansing

The facility is accessed via the Greenogue Business Park internal road network. The whole of the site will be covered with concrete hardstand throughout. Vehicle wheel washing, mud collection and road cleansing is not an issue for the facility.

The site and adjoining roads will be inspected on a daily basis for evidence of excessive generation of airborne dust. If required road cleansing will be employed in order to mitigate dust impact.

Section F:

Control and Monitoring

Attachment F.1

The techniques involved in preventing or, where this is not possible, reducing emissions from the facility are included in the Section 2 of the EIS. The details of ongoing environmental monitoring of potential groundwater, surface water, noise, air and dust emissions are included in the AER, Attachment B3.

Table F. 1. includes detailed descriptions and schematics of all abatement systems.

Attachment F.2 to F.9

The programme for environmental monitoring is as recommended by the EPA and is described in Waste Licence 192-1. Locations of all environmental monitoring points, including 12-figure grid references are shown on Figure 7.1 of the EIS. Both documents are included in Attachment B.3.

Section G:

Resources Use and Energy Efficiency

Attachment G.1

Raw Materials, Substances, Preparations and Energy

Refer to Section 2.4.3 of the EIS.

See Forms –Annex 1.

Attachment G.2

Energy Efficiency

The main energy use at RILTA includes:

- Gas
- Electricity
- Water

A review of electricity and gas bills for the period from 01/01/06 to 31/12/06 shows that RILTA used the following quantities.

Energy	Quantity (Dec 2006)
Gas	712,514 Kwh
Electricity	305,300 Kwh
Water	5,550 m ³

Section H:

Materials Handling

Attachment H.1:

Refer to Section 4 of the AER for a detailed breakdown of all existing waste types and quantities at RILTA. It is proposed that the overall waste throughput allowance will be increased to 111,000. A breakdown of proposed waste tonnage is included below –

Waste Description	EWC Code	Weight/ Tonnes	Proposed TPA	Recycling/Disposal Code
Flocculant	01 03 09	6.16	10	D10 - Incineration on land
Herbicides	02 01 08*	0.47	1	R13 - Storage prior to recovery
Food preparation waste	02 02 99	0.36	1	D10 - Incineration on land
Dairy waste	02 05 01	0.87	1	R3 - Organic Substance Recycling
Varnish	03 02 01*	10.30	20	D10 - Incineration on land
Wood preservatives	03 02 05*	0.52	1	D10 - Incineration on land
Wood preservatives	03 02 99	2.58	3	D10 - Incineration on land
Solvents	04 02 14*	11.58	15	R2 - Solvent Recovery
Sulphuric acid	06 01 01*	36.61	50	R6 - Regeneration of acids or bases
Hydrochloric acid	06 01 02*	0.74	5	R6 - Regeneration of acids or bases
Nitric acid	06 01 05*	3.31	5	R6 - Regeneration of acids or bases

Acidic waste	06 01 06*	5.17	10	R6 - Regeneration of acids or bases
Acidic waste	06 01 99	39.62	50	R6 - Regeneration of acids or bases
Potassium permanganate	06 02 04*	0.50	1	R13 - Storage prior to recovery
Alkaline waste	06 02 05*	3.47	5	R6 - Regeneration of acids or bases
Electronics waste	16 02 13*	0.80	2	R13 - Storage prior to recovery
Zinc cyanide	06 03 11*	4.66	5	D10 - Incineration on land
Potassium nitrate	06 03 14*	9.26	10	R6 - Regeneration of acids or bases
Non specified inorganic waste	06 13 99	16.80	20	D10 - Incineration on land
Aqueous washing liquids	07 01 01*	12.46	20	D10 - Incineration on land
Organic solvents	07 01 04*	40.61	50	R2 - Solvent Recovery
Wipes	07 01 99	1.88	5	D10 - Incineration on land
Solvents	07 02 04*	4.21	5	R2 - Solvent Recovery
Sealants	07 02 14*	1.70	3	R2 - Solvent Recovery
Solvents	07 04 04*	9.90	10	R2 - Solvent Recovery
Waste pesticide	07 04 13*	0.01	1	R13 - Storage prior to recovery
Solvents	07 05 03*	0.18	1	R2 - Solvent Recovery
Solvents	07 05 04*	29.16	50	R2 - Solvent Recovery
Solvents sludge	07 05 09*	8.12	10	R2 - Solvent Recovery
Paint related waste	08 01 11*	244.91	300	D10 - Incineration on land

Varnish waste	08 01 12	54.59	70	D10 - Incineration on land
Paint sludge	08 01 13*	12.91	20	D10 - Incineration on land
Non specified paint waste	08 01 99	6.30	10	D10 - Incineration on land
Ink sludge	08 03 07	3.78	5	D10 - Incineration on land
Ink waste	08 03 12*	300.40	300	R2 - Solvent Recovery
Adhesive waste	08 04 09*	5.09	5	D10 - Incineration on land
Adhesive waste	08 04 10	282.38	300	D10 - Incineration on land
Adhesive waste	08 04 11*	0.03	1	D10 - Incineration on land
Photo developer waste	09 01 01*	59.80	70	R4 - Metal recovery
Photo plate wash	09 01 02*	8.52	10	R4 - Metal recovery
Photo fixer waste	09 01 04*	7.40	2	R4 - Metal recovery
Non specified photo waste	09 01 99	0.48	1	R4 - Metal recovery
Oily fly ash	10 01 04*	32.96	20	D1 - Landfill
Pickling acid	11 01 05*	8.01	10	R6 - Regeneration of acids or bases
Acidic waste	11 01 06*	1.78	2	R6 - Regeneration of acids or bases
Sludge and filter cake	11 01 09*	84.37	100	D1 - Landfill
Electroplating waste	11 01 11*	15.34	20	D10 - Incineration on land
Degreasing waste	11 01 14*	0.06	1	D10 - Incineration on land
Liner waste	11 01 99	1.08	1	D10 - Incineration on land
Copper hydrometallurgy waste	11 02 05*	0.03	1	R6 - Regeneration of acids or bases

Hydrometallurgy waste	11 02 07*	0.29	1	R6 - Regeneration of acids or bases
Zinc cyanide sludge	11 03 01*	7.62	10	R6 - Regeneration of acids or bases
Coolant/glycol	12 01 09*	20.17	20	D10 - Incineration on land
Engine oil	13 02 06*	27.80	20	D10 - Incineration on land
Waste oil	13 02 08*	68.62	80	D10 - Incineration on land
Interceptor waste	13 05 03*	16.49	20	D10 - Incineration on land
Fuel waste	13 07 01*	6.21	10	D10 - Incineration on land
Fuel waste	13 07 03*	7.15	10	D10 - Incineration on land
Oil spill waste	13 08 99*	17.04	20	D10 - Incineration on land
Aerosols	14 06 01*	0.63	1	R13 - Storage prior to recovery
Solvents	14 06 03*	25.11	30	R2 - Solvent Recovery
Solvent contaminated solids	14 06 05*	0.58	1	D10 - Incineration on land
Contaminated packaging	15 01 02	1.44	2	D10 - Incineration on land
Contaminated packaging	15 01 04	1.07	2	D10 - Incineration on land
Contaminated packaging	15 01 10*	100.68	100	D10 - Incineration on land
Absorbents	15 02 02*	139.54	150	D10 - Incineration on land
Absorbents	15 02 03	10.12	10	D10 - Incineration on land
Oil filters	16 01 07*	5.60	10	D10 - Incineration on land
Brake fluids	16 01 13*	5.36	10	D10 - Incineration on land
Antifreeze	16 01 14*	0.15	1	D10 - Incineration on land

Electronics waste	16 01 21*	1.20	2	R13 - Storage prior to recovery
Solvents	16 02 13*	0.30	1	R2 - Solvent Recovery
Non specified inorganic waste	16 03 03*	31.74	30	D10 - Incineration on land
Non specified inorganic waste	16 03 04	6.72	10	D10 - Incineration on land
Non specified organic waste	16 03 05*	2.02	3	D10 - Incineration on land
Non specified organic waste	16 03 06	2.17	3	D10 - Incineration on land
Aerosols	16 05 04*	0.85	1	R13 - Storage prior to recovery
Aerosols	16 05 05	0.01	1	R13 - Storage prior to recovery
Lab chemicals	16 05 06*	34.98	40	D10 - Incineration on land
Lab chemicals	16 05 07*	11.22	15	D10 - Incineration on land
Lead batteries	16 06 01*	9.57	3	R13 - Storage prior to recovery
Battery acid	16 06 06*	0.40	1	R6 - Regeneration of acids or bases
Tank cleaning waste	16 07 08*	7.38	10	D10 - Incineration on land
Tank cleaning waste	16 07 09*	15.93	20	D8 - Biological Treatment
Non specified tank waste	16 07 99	11.34	10	D10 - Incineration on land
Aqueous liquid waste	16 10 01*	31.38	50	D8 - Biological Treatment
C and D waste	17 01 06*	0.30	1	D10 - Incineration on land
Glass	17 02 04*	0.16	1	D10 - Incineration on land
Bituminous waste	17 03 01*	14.30	20	D10 - Incineration on land
Tar	17 03 03*	1.36	2	D10 - Incineration on land

Aluminium sludge	17 04 02	2.94	5	R6 - Regeneration of acids or bases
Asbestos	17 06 01*	99.22	100	D1 - Landfill
Asbestos	17 06 05*	5,718.45	8,000	D1 - Landfill
Clinical sharps	18 01 01	0.48	1	D10 - Incineration on land
Clinical wastes	18 01 03*	0.15	1	D10 - Incineration on land
Clinical waste	18 01 04	0.01	0	D10 - Incineration on land
Clinical waste	18 01 06*	56.60	60	D10 - Incineration on land
Clinical waste	18 01 07	0.29	1	D10 - Incineration on land
Clinical waste	18 01 08*	0.05	0	D10 - Incineration on land
Clinical waste	18 01 09	0.08	0	D10 - Incineration on land
Dental amalgam	18 01 10*	7.33	2	D10 - Incineration on land
Lab chemicals	18 02 05*	3.17	5	D10 - Incineration on land
Lab chemicals	18 02 06	4.00	5	D10 - Incineration on land
Veterinary medicine	18 02 07*	2.10	3	D10 - Incineration on land
Molecular sieve	19 01 99	3.60	1	D10 - Incineration on land
Floc agent	19 02 99	0.17	1	D10 - Incineration on land
Spent carbon	19 09 04	19.02	25	D10 - Incineration on land
Solvents	20 01 13*	1.34	2	R2 - Solvent Recovery
Acids	20 01 14*	3.07	5	R6 - Regeneration of acids or bases
Alkalines	20 01 15*	0.80	2	R6 - Regeneration of acids or bases

Photochemicals	20 01 17*	0.74	1	R5 - Inorganic substance recycling
Pesticides	20 01 19*	0.20	1	R13 - Storage prior to recovery
Fluorescent tubes	20 01 21*	0.20	1	R13 - Storage prior to recovery
Aerosols	20 01 23*	0.23	1	R13 - Storage prior to recovery
Edible oil and fat	20 01 25	6.98	10	R3 - Organic Substance Recycling
Waste oil	20 01 26*	8.35	10	D10 - Incineration on land
Paint waste	20 01 27*	94.09	150	D10 - Incineration on land
Detergents	20 01 29*	0.48	1	D10 - Incineration on land
Spent medicines	20 01 31*	0.60	1	D10 - Incineration on land
Non specified municipal waste	20 03 99	4.04	5	D10 - Incineration on land
Contaminated Soil	17 05 03*	42,725.81	60,000	D15 - Storage pending any of the operations numbered D1-D12
Waste Drums	15 01 10	103.77	150	D1 - Landfill
Waste Drums	15 01 10	15.57	20	R13 - Storage prior to recovery
Waste Drums	15 01 10	478.1	500	R4 - Metal recovery
Waste Drums	15 01 10	788.76	1000	R4 - Metal recovery
Stonecutting Wash	01 04 13	328.96	350	D9 - Physico chemical treatment
Chloride -containing Drilling Muds	01 05 08	115.20	150	D9 - Physico chemical treatment
Wood processing Wash	03 01 99	10.32	5	D9 - Physico chemical treatment
Tank bottom sludges	05 01 03*	1.72	5	D9 - Physico chemical treatment
Acidic waste	06 01 06*	20.78	30	D9 - Physico chemical treatment

Effluent treatment sludges	06 05 02*	21.82	30	D9 - Physico chemical treatment
Aqueous washing liquids	07 01 01*	30.24	30	D9 - Physico chemical treatment
Aqueous washing liquids	07 03 01*	25.82	30	D9 - Physico chemical treatment
Paint related waste	08 01 11*	32.09	30	D9 - Physico chemical treatment
Aqueous liquid waste containing ink	08 03 08	6.55	10	D9 - Physico chemical treatment
Sludges from boiler cleansing	10 01 22*	21.88	30	D9 - Physico chemical treatment
Sludges from boiler cleansing	10 01 23	98.20	100	D9 - Physico chemical treatment
Sludges and filter cake	11 01 09*	16.92	20	D9 - Physico chemical treatment
Aqueous rinsing liquids	11 01 11*	5.80	10	D9 - Physico chemical treatment
Coolant	12 01 09*	1,836.44	2,000	D9 - Physico chemical treatment
Mineral-based hydraulic oils	13 01 10*	7.23	10	D9 - Physico chemical treatment
Synthetic hydraulic oils	13 01 11*	1.50	10	D9 - Physico chemical treatment
Hydraulic oils	13 01 13*	11.86	20	D9 - Physico chemical treatment
Mineral-based engine, gear and lub oils	13 02 04*	0.92	1	D9 - Physico chemical treatment
Mineral-based engine, gear and lub oils	13 02 05*	12.10	15	D9 - Physico chemical treatment
Synthetic gear, engine and lub oils	13 02 06*	45.08	50	D9 - Physico chemical treatment
Engine, gear and lub oils	13 02 07*	11.44	15	D9 - Physico chemical treatment
Engine, gear and lub oils	13 02 08*	742.56	1000	D9 - Physico chemical treatment
Bilge oil	13 04 03*	230.04	250	D9 - Physico chemical treatment
Solids from grit chambers	13 05 01*	25.88	30	D9 - Physico chemical treatment

Sludges from oil/water separators	13 05 02*	3.00	5	D9 - Physico chemical treatment
Interceptor sludges	13 05 03*	9,871.47	10,000	D9 - Physico chemical treatment
Oily water	13 05 07*	84.70	100	D9 - Physico chemical treatment
Wastes from grit chambers	13 05 08*	8.94	10	D9 - Physico chemical treatment
Fuel oil and diesel	13 07 01*	150.39	200	D9 - Physico chemical treatment
Mixed Fuels	13 07 03*	107.74	150	D9 - Physico chemical treatment
Oil spill waste	13 08 99*	463.49	500	D9 - Physico chemical treatment
Brake fluids	16 01 13*	11.11	15	D9 - Physico chemical treatment
Antifreeze	16 01 14*	0.12	0	D9 - Physico chemical treatment
Electrolyte from batteries	16 06 06*	22.51	25	D9 - Physico chemical treatment
Tank cleaning waste	16 07 08*	1,770.18	2,000	D9 - Physico chemical treatment
Tank cleaning waste	16 07 09*	7.42	10	D9 - Physico chemical treatment
Non specified tank waste	16 07 99	387.76	400	D9 - Physico chemical treatment
Aqueous liquid waste	16 10 01*	1,244.22	1,500	D9 - Physico chemical treatment
Dredging Spoil	17 05 06	1.00	2	D9 - Physico chemical treatment
Waste oil	20 01 26*	17.88	20	D9 - Physico chemical treatment
Paint waste	20 01 27*	274.30	200	D9 - Physico chemical treatment
Non specified municipal waste	20 03 99	1.52	2	D9 - Physico chemical treatment

Attachment H.2:

Refer to Section 2.3.3, Section 2.4.1 and in particular Section 2.5.2 of the EIS for procedures for checking waste loads as they arrive at the facility.

Attachment H.3:

Refer to Section 2.3 and Section 2.4 of the EIS for all details related to waste handling and operating procedures used at the facility including waste treatment processes and contaminated soil facilities.

Attachment H.4:

The quantities of each type of waste generated on an annual/monthly basis should be calculated and stated in Tables H.1(i) and H. 1(ii) of the application form. Applicants should also provide conversion factors used to relate volume (m³) and tonnage (t) for their waste stream.

Refer to Section 4 of the AER in Attachment B.3 for contaminated soil quantities taken in and transferred offsite from January to December 2006.

Section I.**Existing Environment****Attachment I.1:**

An assessment of atmospheric emissions is included in Section 8 of the EIS and in Section 5.4 of the AER.

Attachment I.2:

An assessment of impact on receiving Surface Water is included in Section 7 of the EIS and in Section 5.2 of the AER.

Attachment I.3:

An assessment of Sewage Discharge is included in Section 7.5 of the EIS and in Section 5.3 of the AER.

Attachment I.4:

An assessment of groundwater emissions is included in Section 7 of the EIS and in Section 5.1 of the AER. Groundwater quality is described in these sections.

Attachment I.5:

An assessment of groundwater in BH2 and BH3 is currently underway as requested by the EPA on April 25th 2007. Recent groundwater monitoring data is included in Section 7 of the EIS and in Section 5.1 of the AER. The locations of current boreholes on site are shown in Figure 7.1 of the EIS. Groundwater quality is described in these sections.

Attachment I.6:

An assessment of noise emissions is included in Section 9 of the EIS and in Section 5.6 of the AER. The locations of all noise monitoring points on site are shown in Figure 7.1 of the EIS.

Attachment I.7:

An assessment of ecological impacts and mitigation measures are included in Section 5 of the EIS.

Section J.**Accident Prevention and Emergency Response****Attachment J:**

Refer to Section 2 of the Environmental Impact Statement. In particular, refer to Section 2.4.7 and Section 2.7.5 for details of emergency procedures in the event of an accidental spillage on site. Ongoing environmental monitoring of all parameters on site ensures that unexpected emissions are recorded on site and reported to the EPA, as described in Section 2.8 of the Environmental Impact Statement.

Section K.**Remediation, Decommissioning, Restoration and Aftercare****Attachment K:**

Refer to Section 2.8.4 and 2.8.5 of the Environmental Impact Statement.

Section L.**Statutory Requirements****Attachment L.1:****Section 40 (4) WMA**

An EPA waste licence is active for the facility –Waste Licence 192-1. All monitoring is carried out in compliance with this licence and quarterly and annual reports are issued to the EPA detailing all monitoring results.

Section 40 (4) (a)-(g)

- (a) A waste licence, No. 192-1, is currently active at the RILTA facility and all emissions that exceed the individual parameter thresholds are reported to the EPA.
- (b) Routine monitoring and operations are carried out in accordance with the conditions of the current waste licence, No. 192-1.
- (bb)N/A

- (c) RILTA aim at all times to use best available techniques to prevent or eliminate or, where it is not practicable, to limit, abate or reduce an emission from the activity concerned.
- (cc) The activities concerned are consistent with the objectives of the National Waste Management Policy, National Hazardous Waste Management Plan and the Dublin Waste Management Plan 2005-2010 as described in Chapter 3 of the EIS.
- (d) The facility currently holds a waste licence and the Directors and management responsible for this waste licence are “fit and proper” as described in Section C and Section L of this Waste Licence Application.
- (e) The applicant has complied with any requirements under Section 53.
- (f) Energy will continue to be used efficiently in the carrying on of operations at the facility. Energy use for 2006 is discussed in Section G and Attachment G herein.
- (g) Routine noise monitoring is included in the conditions of the current waste licence. In addition, impacts on noise based on the proposed increase in tonnage are described in Section 9 of the EIS. It was reported, following a detailed traffic and noise predictive assessment, that the increase in noise due to an increase in waste throughput at the facility will be insignificant.
- (h) Health and Safety procedures are in place at the facility as listed in the EMS (Environmental Management Statement) in Attachment C.2. In addition, details of emergency procedures in the event of an accidental spillage on site will be followed as stated in Section 2.4.7 and Section 2.7.5 of the EIS. Ongoing environmental monitoring of all parameters on site ensures that unexpected emissions are recorded on site and reported to the EPA, as described in Section 2.8 of the Environmental Impact Statement.
- (i) Refer to Section 2.8.4 and 2.8.5 of the Environmental Impact Statement.

An Environmental Impact Statement has been submitted to South Dublin County Council to accompany this application.

Attachment L.2:

Fit and Proper Person

Neither the Directors of RILTA Environmental Ltd, nor any other relevant person connected with RILTA Environmental Ltd have been convicted under the Waste Management Act 1996, of offences as prescribed in Regulations. RILTA will ensure that all plant and procedures comply with BAT standards.

An organisational chart of the current management structure is shown in Figure C.1. and the applicant’s technical knowledge and/or qualifications, along with that of other relevant employees is included in Attachment C.1. above.

A single confidential copy of the Financial Provisions (Environmental Liabilities Risk Assessment (ELRA) Report) is attached below.

WASTE LICENCE COMPLIANCE:

CONDITION 12.2.1

ENVIRONMENTAL LIABILITIES RISK ASSESSMENT

JUNE 2005

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1 INTRODUCTION

This Environmental Liabilities Risk Assessment has been conducted in accordance with Condition 12.2.1 of Waste Licence No. 192-1 for Rilta Ltd., trading as SITA Environmental, for their Waste Recovery Facility located at Block 402 Greenogue Business Park, Rathcoole, County Dublin.

Condition 12.2.1 is reproduced herein below:

“12.2.1 The licensee shall arrange for the completion of a comprehensive and fully costed Environmental Liabilities Risk Assessment for the facility which will address liabilities arising from the carrying on of the activities to which this licence relates. A report on this assessment shall be submitted to the Agency for its agreement within six months of date of grant of this licence.”

This document assesses the risk associated with the Waste Recovery Facility and outlines the details of Insurance Cover for the facility.

1.1 Facility Outline

The hazardous waste transfer/recovery facility has been constructed on a serviced site in the Greenogue Industrial Estate and has been in operation since December 2004. There are no environmental risks or liabilities due to previous historical activities at the site. The site location is shown on Drawing No. 1102/02/301 included in Attachment 4.

The structure of the overall facility and associated infrastructure has been substantially complete and final finishing works including fitting out of the building internals is ongoing as of the date of this report.

The Facility consists of three discrete components namely:

- Drum Recovery Centre;
- Hydrocarbon Waste Treatment Centre; and,
- Hazardous Waste Transfer Station.

These components are contained within three separate industrial type buildings as shown on the Site Layout, Drawing No. 1102/02/305, Attachment 4. The facility layout provides for the following:

- Containment of each facility in order to prevent pollution to either soil or water;
- All operations take place within fully enclosed buildings, which mitigate potential noise, odour and dust impacts;
- The separate control of foul and surface waters on site;
- Sufficient road areas within the site to accommodate queuing and the free flow of vehicles on site;
- On site administration facilities for site staff; and
- Sufficient room for vehicle parking and landscaping of the site.

1.2 Potential Risk

The scope of the risk assessment includes:

- Risk associated with current activities, which comprises of the recovery of drums, the treatment of hydrocarbon waste and the transfer of hazardous wastes.
- Risk associated with current activities, collection of washwater and effluent from the facility and from the washing of vehicles. The pumping of same for treatment/ recycling off-site to the adjacent foul sewer;
Risk associated with the temporary storage of 520tonnes of hazardous waste at the site.
- Risk associated with potential emergency situations, including fire, explosion, spillage, and any other potential unscheduled emission/ incident;
- The effect of same on the environment or neighbours to the facility and adjoining land uses;
- Issues associated with possible future plant decommissioning and post closure care (site decommissioning and decontamination);
- A description of the control and mitigation features, existing and proposed to minimise the risk to the environment; and
- Recommendations for additional control and mitigation features.

1.3 Contingency Arrangements

The following contingency arrangements are provided at the facility:

1.3.1 Contingency Plans for any Emergency On-Site.

Accidents and other emergencies will be handled by calling in the relevant authorities including the Fire Service, Gardaí, or Ambulance Services. Emergency response contact numbers for all these services are prominently posted on-site. All site operatives and other relevant employees of SITA are trained in emergency response procedures and in fire prevention and control.

Site safety procedures will be adopted to protect any persons from injury on-site. Should injury occur, the site operative will be the first to administer assistance. Emergency and first-aid materials will be available in all the site buildings. Emergency and first-aid procedures are also be prominently displayed in the site buildings adjacent to the waste inspection and quarantine areas.

The primary contingency for the proposed facility relates to fire control, which is dealt with in some detail in Section 5.1 herein. An Environmental Management System (EMS) will be implemented for the site.

The Managing Director of SITA Environmental, Mr. Seamus Clancy, is also the Health and Safety Director for the company. He is based full time on site and thus acts as the Health and Safety Officer for the facility. The Health and Safety Statement for the facility has recently been prepared. The Statement has been prepared in accordance with The Safety, Health and Welfare Act 2005.

1.3.2 Contingency Plans for any Breakdowns On-Site

The regular maintenance of all plant and equipment utilised on-site is undertaken in accordance with the manufacturers guidelines. This maintenance programme helps to minimise occurrences of breakdowns on-site. In the event of any breakdown, the item of plant or equipment are promptly repaired or replaced. The facility has 2No. full time maintenance engineer is employed on site to undertake these tasks. All plant and equipment is checked on a daily basis.

1.3.3 Contingency Plans in Respect of Absentee Staff

Fully trained part time staff employed directly or on contract by SITA will be deployed to the site if necessary in the event of sickness of key personnel. With over 40 persons proposed to be on-site, staff can be deployed in order to cover for absentee staff.

1.3.4 Contingency Procedures Outside Normal Operating Hours

The site will be unattended by SITA staff during the night, Sundays and Bank Holidays. However, site personnel and other employees of SITA will be available in the event of any emergency at the site outside of normal working hours. An emergency contact number is prominently posted at the site entrances. In addition, the security firm monitoring the whole of the Business Park also monitors the SITA facility outside working hours. The security personnel have the contact details of local emergency services.

These security arrangements are in place in order to guard against unlawful trespass and vandalism. Basic routines exist whereby any cash, records and equipment are either taken off-site daily or secured in the site buildings. These procedures are in the interest of overall security.

1.3.5 Contingency Plans in the Event of Environmental Contamination

The site infrastructure encompasses a fully contained site and all operations take place within separately contained buildings, thus preventing the possibility of a significant groundwater contamination incident. In the unlikely event of the need to contain the dispersion of groundwater, extraction wells will be installed down gradient of the site.

The discharge from the surface water attenuation tanks to the Griffeen River is valved and daily discharges are monitored on a regular basis. In the unlikely event that deterioration in the surface water runoff quality being discharged is detected or if there is an external spillage on-site, a cut-off valve at the discharge from the attenuation tanks will be activated either remotely or manually and all surface water will be contained in the attenuation tanks. This system will allow for the retention of all surface water on-site until the spill event is investigated and remediated. It will also be possible to provide emergency pumping from the attenuation tanks to the foul water sewer in the event of a continued spillage.

In addition to the above and in the unlikely event of fire at the site, all firewater collected in the surface water drainage system can be contained in the attenuation tank. The firewater will only be discharged to the Griffeen River after it has been tested and it has been established that it is safe to do so. Otherwise, the firewater can be treated on-site in the Hydrocarbon Waste Treatment Facility or it can be tankered off-site for treatment, depending on the degree of contamination.

2 INSURANCE POLICY

Documentation from SITA's insurance company is provided in Attachment 2. The insurance policy will cover any public liability caused by either an accidental event or an emergency situation not intentionally caused.

2.1 Details of Cover

Employers Liability:

Limit of the indemnity – EUR €13,000,000 any one accident/ unlimited during the Period of Insurance.

Public Liability:

Limit of Indemnity – EUR €6,500,000 any one accident/ unlimited during the Period of Insurance.

Property:

Fire and Special Perils on Property, Machinery, Plant, Fixtures and Fittings

Sum Insured – EUR €6,500,000. This sum also includes for cover for Stock Debris.

Consequential Loss:

Gross Profit – EUR €4,000,000.

2.2 Summary

In relation to the insurance policy, it is evident that;

- The public liability due to a fire is considered to be medium to low because of the temporary nature of the waste on-site, the level of the on-site emergency preparedness and response, and the low environmental risk associated with any firewater arising at the facility.
- The public liability due to an explosion would be mainly structural damage, which will be covered by the proposed insurance policy.
- Due to the containment arrangements and surface water catchment system, a major spill to ground, drain, or watercourse is unlikely to occur. In the event of an emergency that may occur on site, such as fires, explosions, and major spills, the insurance will cover both public liability and on-site restoration.

3 METHODOLOGY

3.1 Risk and Risk Management

Risk can be defined as the likelihood or expected frequency of a specified adverse consequence. Applied to air/soil/water, it expresses the likelihood of contamination arising from potentially polluting sources or activities (called **hazards**). The term **environmental hazard** can be defined as “an event, or continuing process, which if realized, will lead to circumstances having the potential to degrade, directly or indirectly, the quality of the environment”. Consequently a hazard presents a risk when it is likely to affect something of value (the **target**). It is the combination of the probability of the hazard occurring and its consequences that is the basis of **risk assessment**.

In assessing the hazard rating to the environment consider:

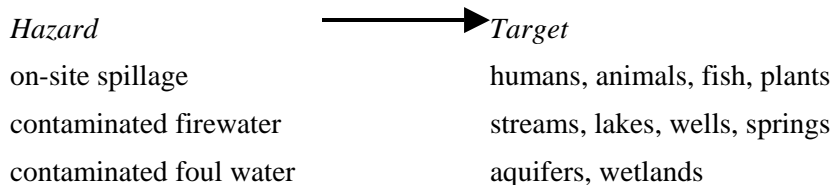
$$\text{RISK} = \text{PROBABILITY OF AN EVENT} \times \text{CONSEQUENTIAL DAMAGE}$$

The conventional source-pathway-target model for environmental management can be applied to this Environmental Liabilities Risk Assessment Report.



The main potential sources of contamination or hazards at SITA Environmental are foul water from the vehicle wash, on-site spillages, contaminated firewater with the ‘ground’, and air being the pathways.

In this report, the hazards being considered are listed below, and therefore the pathway is either or both underground in geological materials or over ground in surface run-off. There are several potential targets as shown below.



The risk of contamination of groundwater depends on three elements:

- The hazard afforded by a potentially polluting activity
- The vulnerability of groundwater to contamination
- The potential consequences of a contamination event

Risk management is based on analysis of these three elements followed by a response to the risk. This Environmental Liabilities Risk Assessment includes the assessment and selection of options and the implementation of measures to prevent or minimise the probability of a contamination event and to provide for the financial consequences should it occur.

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4 SITE DEVELOPMENT AND OPERATION

The EPA licensed the SITA site to conduct waste activities in accordance with the Waste Management Act 1996 as amended:

The principal activity undertaken at the site is Class 8 of the Fourth Schedule of the Waste Management Act (1996), namely:

Class 8. Oil re-refining or other re-uses of oil

The facility operation is also covered by the following classes of activities from the Third and Fourth Schedules of the Waste Management Act, 1996:

Third Schedule

Class 7 Physico-chemical treatment not referred to elsewhere in this Schedule (including evaporation, drying and calcination), which results in final compounds or mixtures, which are disposed of by means of any activity, referred to in paragraphs 1. 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 to any activity referred to in a 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 is produced.

Fourth Schedule

Class 2 Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).

Class 3 Recycling or reclamation of metals and metal compounds.

Class 4 Recycling or reclamation of other inorganic materials.

Class 6 Recovery of components used for pollution abatement

Class 8. Oil re-refining or other re-uses of oil. (principal activity)

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

In addition to SITA's own waste permitted collection fleet, other permitted contractors bring waste to the Facility, which is treated on-site. Any waste transferred off-site is hauled by permitted contractors to licensed facilities.

The Waste Licence allows for the bulking and storage of hazardous waste with such items stored in the contained Hazardous Waste Transfer Station pending collection by a registered contractor. The Drum Recovery Building and the Hydrocarbon Treatment Building are also separately contained.

The water main and foul sewer service the site and the remainder of the Greenogue Business Park.

The major construction works at the facility have been completed. The site access roads and parking areas are fully covered by a bituminous surface, and the surface water drainage network feeds into the grit trap and oil interceptor prior to discharge to the adjacent stream.

The foul water network currently collects wastewater from the weighbridge, the vehicle wash bay, the offices in each of the facility buildings and the main administration building. The surface water runoff generated in the Hazardous Waste Transfer Station and Drum Recovery Facility is collected and stored in the surface water collection network in each building. Both networks are connected to the on-site foul water system. However, the buildings are isolated by a cut-off valve, which is predominately in the closed position. In the event of a fire in these buildings, the contaminated firewater will be collected via the surface water collection network and will be contained in the buildings. The firewater can be sampled and tested and, only when it is safe to do so, the cut-off valve can be opened and the firewater can be released to the foul water network.

In the Hydrocarbon Treatment Building, the surface water runoff collected by the internal surface water collection network is connected directly to the large settlement tanks. This means that it is possible to totally isolate the Hydrocarbon Treatment Building from the rest of the site. In the event of a fire, firewater can be stored in the settlement tanks. Firewater from this building will not go to the on-site foul water network.

5 RISK ASSESSMENT – CURRENT ACTIVITIES

5.1 Fire

Source

Flammable non-hazardous materials, approximately 5tonnes of timber pallets and cardboard, may be stored in each of the three buildings. Approximately 100tonnes of flammable hazardous waste comprising of solvents and other flammable liquids will be stored in the Hazardous Waste Transfer Station at any given time. These liquids will be stored in drums and Intermediate Bulk Containers (IBCs). In general the drums in the Drum Recovery Centre will be empty and therefore not contain flammable liquids, however the IBCs themselves could be flammable in the case of extreme temperatures. The recovered waste oil and hydrocarbon sludges are stored in the Hydrocarbon Waste Treatment Centre. Approximately 170tonnes of recovered waste oil and hydrocarbon sludges is stored on-site at any given time. The recovered waste oil may be a possible fire hazard.

Pathway

Fire on site will potentially give rise to smoke and fumes in the immediate vicinity of the site and downwind. It will also potentially give rise to contaminated firewater that must be contained and managed. The potential for fire to spread from one flammable storage area to another must be considered.

Receptor

The estate currently contains a mix of both light industrial and warehousing units. In 2005, approximately 1,000,000m² has been constructed.

The land surrounding the proposed development site is industrial in nature. To the south internal industrial estate roads bound the site. There is an industrial unit immediately adjacent to the east of the site and further west there are more industrial units. The property to the west of the site is presently not developed but is used as a truck park. The buildings and storage yard for John Paul Construction Ltd. are located to the north of the site. The northern boundary of the site is also adjacent to the Griffeen River. The distance of other industrial units from the facility is sufficient enough to prevent the spreading of fire.

Separate foul and surface water networks are in place at the site. The surface water runoff from the site hardstand areas is passed through a grit trap and oil separator prior to being released to the stream at the northern boundary of the site.

The foul water network collects foul water consisting primarily of wash water from each of the three separately contained waste recovery buildings, and domestic foul from the administration building, the weighbridge and the vehicle wash bay.

Mitigation Measures

All site buildings are no-smoking areas.

Fire Safety Certificates have been obtained from South Dublin County Council for all the site buildings with copies included in Attachment 1. All the buildings are covered by insurance for fire damage. The following design features for fire prevention and containment were incorporated.

- External Walls – 200mm Reinforced Concrete Walls, 300mm Block Cavity Wall or 215mm Solid Block Wall with Class 1 surface and 1hr Fire Resistance
- External PVC Coated Steel Cladding – Wall & Roof Cladding providing 1hr Fire Resistance
 - Kingspan KS1000 RW Insulated Wall & Roof Panels
 - Integrity = 136min.,
 - Insulation = 16min.,
- Steel Structural Frame – All columns on all external boundaries are encased in concrete or coated with Intumescent Fire Protection Paint to provide 1hr Fire Resistance. Rafters and eaves beams are coated with Fire Retardant Paint on all external boundaries to provide 1hr Fire Resistance.
- Fire Protection Equipment – Hose Reels conforming to I.S. EN 671: Part 1 1995 to be installed in accordance with BS 53076: Part 1 1976 Fire Extinguishing Installations and Equipment on premises.
- Oxyacetylene Tanks – All Oxyacetylene tanks/ cylinders for welding are stored within a contained area in the Hydrocarbon Waste Treatment building.

The fire detection and alarm system proposed for the facility shall be a L3 type system. The system will be designed and installed in accordance with I.S 3218: 1989 Code of practice for fire

detection and alarm system. Due to the size of the buildings, detection will be achieved through the use of either:

- Optical beam detectors provided along the length of the building at high level within the main shop floor areas of the Hydrocarbon Waste Treatment Centre and the Drum Recycling Centre;
- Or alternatively where feasible optical smoke detectors will be provided in accordance with I.S 3218:1989.

Smoke detection will be provided to the offices at ground and first floor level, to the escape stairs and the corridors serving offices at the first floor level. Manual break glass units will be provided, along with sounders and point smoke detectors.

There is no sprinkler system in the warehouse as some Class 4.3¹ material (dangerous when wet) may be stored therein.

The company has an Emergency Response Procedure (Refer to Attachment 3) to be activated in the event of fire or other emergency. A designated storage area for emergency responses, fitted with materials for containment and collection of spilled material, first aid equipment, and personal protective equipment (PPE). Also fire extinguishers and fire hoses are provided in the buildings in compliance with current health and safety legislation. The provision of this fire/smoke detection and fighting equipment reduces the risk of the spread of a fire.

In the event of a fire, the trained on-site personnel would attack the fire following the emergency procedures. The response time of the local fire brigade is 10 minutes, at which point the trained personnel fighting the fire will allow them to take over. SITA have employed a full time Health and Safety Officer who will regularly inspect all fire/smoke detection and fighting equipment.

The surface water runoff generated in the Hazardous Waste Transfer Station and Drum Recovery Facility is collected and stored in the surface water collection network in each building. Both networks are connected to the on-site foul water system. However, the buildings are isolated by a cut-off valve, which is predominately in the closed position. In the event of a fire in these

¹ * Note : UN Classes of Hazardous Materials categorise Class 4.3 material as “Substances which in contact with water are liable to become spontaneously flammable or to give off flammable gases in dangerous quantities”

buildings, the contaminated firewater will be collected via the surface water collection network and will be contained in the buildings. The firewater can be sampled and tested and, only when it is safe to do so, the cut-off valve can be opened and the firewater can be released to the foul water network.

In the Hydrocarbon Treatment Building, the surface water runoff collected by the internal surface water collection network is connected directly to the large settlement tanks. This means that it is possible to totally isolate the Hydrocarbon Treatment Building from the rest of the site. In the event of a fire, firewater can be stored in the settlement tanks. Firewater from this building will not go to the on-site foul water network.

It is envisaged that the nature of the operation does not pose a major risk of fire although the following steps have been taken to ensure an acceptable level of fire safety:

- Training of all site operatives and employees in fire prevention and control by a fire prevention company;
- Prominent posting of emergency response contact numbers (fire service, police, ambulance and other agencies);
- The provision of on-site water supply;
- The provision of fire fighting equipment including fire extinguishers in all buildings, fire hydrants and fire hoses adjacent to all buildings;
- Fire alarm and detection system in all buildings;
- There will be no long term storage of waste on-site;
- A fire assembly point will also be posted on-site at the site entrances;
- The designation of smoking and non/smoking areas.
- A secure storage area is provided externally for the secure night-time storage of the oxy-acetylene tanks used in welding.

The site is serviced by 3No. fire hydrants on the 150mm (dia) fire water-main and which are serviced by the on site water-main. The adjoining river and water attenuation tanks could be also used by the Fire Brigade to provide a large supply of water for fire fighting.

In addition the buildings proposed for the site will be certified for fire safety.

5.1.1 Fire - Environmental Risk and Liability

The major environmental risk due to fire is the potential for contaminated firewater to enter the surface water system and then enter the stream, or to leak through a fissure in the ground or retention tank and enter the groundwater. The bituminous hardstand cover on the site, the surface water control system and other on-site controls as described minimise these risks.

Contamination of Groundwater

The potential risk of contamination of groundwater is low. In the possible event of contamination, the polluted groundwater would have to be pumped out and treated on-site at the Hydrocarbon Waste Treatment Facility. The nature of the pollutant would be mainly water with possible traces of fire-fighting foam, partially burnt residues and trace hazardous materials. The cost of treatment or disposal would depend on the nature(s) and concentration(s) of the residual material(s).

In the case of abstracted ground water containing residual hazardous material of a hydrophobic, organic nature (e.g. non-polar solvent), there are two possible options available. The contaminated groundwater can be treated on-site at the Hydrocarbon Waste Treatment Facility, or incineration of the contaminated groundwater abroad. The latter would be the most expensive option due to the low calorific value of wastewater.

The cost of treating the contaminated water in Ireland would be €15/T. The cost of incineration abroad would be approximately EUR€50/T. Transport overseas to the final disposal destination would cost an additional EUR€20/T. Thus, taking the worst-case scenario, i.e. having to send 180T (16-18 tanker-loads) of contaminated water for incineration abroad, would cost EUR€20,600.

Contamination of Soil

A level of soil remediation might also be required. There are two possible options available for soil remediation. The first option is to treat the contaminated soil in Ireland by a hazardous waste treatment company using a variety of processes, i.e. soil washing, biological treatment or thermal desorption. The second option is incineration or landfilling of the contaminated soil abroad.

The cost of treating the contaminated soil in Ireland would be €180/T. The most expensive possible option required would be incineration of the contaminated soil, at a cost of EUR€40-210/T, depending on the level and nature of the contamination. Transport overseas to the final destination would cost an additional EUR€40/T. Thus, taking the worst case scenario, i.e. having

to send 600T of contaminated soil for incineration abroad would cost up to EUR€150,000, excluding the cost of excavation.

Contamination of Surface Water

Surface water contamination could possibly lead to contamination of the adjacent soil and sediment, which could incur costs as discussed above. It might also lead to damage to the local flora and fauna populations, which might require re-stocking.

In general, the principal drainage within the site is from the north towards the Griffeen River. The Griffeen River flows adjacent to the northern boundary of the site. The Griffeen River, is a tributary of the River Liffey comprises a catchment area of approximately 13 km². The origin of the Griffeen River lies ca. 2km to the south west of the proposed site. The Griffeen River flows north for ca. 500 m (to the east of the site) and then flows west flowing outside the northern boundary of the site. The Griffeen River then trends in a northerly direction and meets the River Liffey at Lucan, ca. 7.5 km north of the site.

These receiving waters are of major recreational importance, as well as being ecologically sensitive.

It is difficult to assess the impact of any polluting incident, but the mitigation procedures in terms of bunding, containment, surface water monitoring and surface water retention all reduce the risk of pollution of surface water by fire-water run-off to a negligible level.

Conclusion

Based on the maximum quantity of material that could possibly be released, the cost of such remediation is estimated not to exceed EUR€300,000.

5.2 Explosion

Source

SITA is not licensed to store Class 1 explosive materials, so there is no immediate danger of explosion of such material. The main danger of explosion would arise when a flammable atmosphere occurs, possibly due to leakage of other flammable material, giving rise to a

flammable vapour, which is then ignited. There will be no operations that could give rise to a dust explosion.

Pathway/ Receptor

Explosion could give rise to a vibration that could damage buildings, equipment and cause injury to anyone in the vicinity. It would be due to a sudden liberation of gas and heat; the gas being a potential pollutant to the atmosphere.

Mitigation measures

All electrical equipment in the Hazardous Waste Transfer Station is Ex-rated and is intrinsically safe. All electrical equipment is earthed with bonding and earthing procedures in place.

5.2.1 Explosion - Environmental Risk and Liability

Mitigation measures as described above will minimise the risk of an explosion an explosion incident

Releases to air

In the unlikely event of such an incident, the major environmental risk due to explosion is the potential release of hazardous gases/vapours to the environment. The quantity, nature, and effect of these gases depend entirely on the circumstances leading to the explosion.

Breaches of the Air Pollution Act 1987 and of the conditions of the Waste Licence would incur fines and penalties. There is also the remote possibility of damage to the health of the workers, visitors to the site, and potentially to nearby residents. It is not possible to determine ahead of time what the possible potential compensation liabilities could arise, as costs would be decided by a court of law.

SITA has public liability insurance up to a limit of EUR€6,500,000 in respect of each and every claim.

Damage to site, equipment, and buildings

The SITA Hazardous Waste Facility is covered by property insurance for EUR€6,500,000, which covers against fire and special perils on property, machinery, plant, fixtures and fittings. This

cover also includes a contingency for the cover of stock debris. The cost of restoration of all buildings and equipment on site is estimated to be EUR€5,500,000.

There could also be some damage to the site and surrounding buildings; damage to surrounding buildings is covered by public liability insurance with a limit of indemnity of EUR€5,500,000 in respect of each and every claim (see Attachment 2).

5.3 Spillage

Source

A spill may occur in a storage area or a processing area, from a leaking or damaged container or during transfer of the contents.

Pathway

The spilled material may be a liquid, solid or gas, which may give rise to surface water contamination, dangerous fumes or vapours, or react with something in the immediate surroundings.

Receptor

In the absence of the specified mitigation measures below, the spilled material could attack concrete and contaminate the groundwater. It could affect the operational personnel or give rise to a cloud of fume or vapour in the vicinity. It is possible that it might react with another materials nearby and explode, catch fire or give rise to some hazardous by-product. There is also a remote possibility that it could enter the surface water collection system.

Mitigation Measures

As part of the acceptance procedures, all waste entering the facility must be hauled by a permitted waste contractor and be accompanied by the necessary documentation, detailing the source and type of the waste.

Loads containing materials other than those permitted by the licence shall be transferred to the waste inspection area and here the non-conforming materials are segregated for storage in the waste quarantine areas.

All of the buildings are separately contained and the foul water collection system within each building can be shut-off prior to discharge. Any spillages within each building can therefore be

contained within that building and be dealt with according to the prescribed emergency procedures. Contaminated material and adsorbents will be collected and packaged for disposal by a suitably licensed facility

Any spillage on the uncontained areas of the bituminous surfaces of the access and car parking areas will be collected in the surface water drainage network. This network feeds into an underground attenuation tank, followed by a grit trap and oil interceptor. Any sediment from road cleaning operations will settle out in the attenuation tank or will be contained by the grit trap. Any light liquids (oils, fats, or greases) in the surface water will be contained in the bypass interceptor and stored for collection and disposal.

There is little possibility that spillages from any of these uncontained areas could enter the stream as discharge. A visual inspection of the surface water discharge is carried out weekly and recorded at the facility. This inspection would pick up the presence of any oil films on the water, discoloration of the soil, stones, fauna around the discharge point and the presence of rubbish or debris carried from the site. Presence of any of these parameters warrants immediate corrective action, which is also recorded at the facility.

The Underground Storage Tanks in the Hydrocarbon Treatment Facility are coated with Sika epoxy based secondary containment lining and a leak detection system has been provided adjacent to these tanks. The coating will mitigate against the spillage from the tanks and in the very unlikely event that such a spillage would occur the hydrocarbons will be detected by the leak detection system.

All waste processing operations take place indoors and each building is provided with easily retractable doors. Putrescible waste is stored on the site and any potential to cause odours is greatly reduced due to the short residence time of waste in the facility.

5.3.1 Spillage - Environmental Risk and Liability

The potential risk of contamination of groundwater/ soil is very low. In the unlikely event of simultaneous failure of all the mitigation measures, bunding, retention systems and monitoring procedures and the loss of all the contents of a tank, the maximum quantity of material that could be lost is 500L of hydraulic oil, 10,000L of diesel, 5,000L of paint, and 5,000L of kerosene, based on the maximum capacities of the various contaminants stored on-site.

Contamination of groundwater

The potential risk of contamination of groundwater is very low. In the possible event of contamination, the polluted groundwater would have to be pumped out and transported by road tanker for recycling/treatment or disposal at a suitably licensed facility. The cost of treatment or disposal would depend on the nature and concentration of the hazardous material contaminating the abstracted groundwater

In the case of abstracted groundwater containing residual hazardous material of hydrophobic, organic nature (e.g. non-polar solvent), the most expensive possible option required would be incineration of the contaminated groundwater. Due to the low calorific value of waste with such a high water content, the cost of incineration would be approximately EUR€50/T. Transport overseas to the final disposal destination would cost an additional EUR€20/T. Hence, incineration of 60T of material would EUR€1,200.

Less expensive and more environmentally favourable options for onsite remediation, local recycling, and treatment would all be explored, before incineration would be considered.

Should the abstracted groundwater contain residual hazardous material of an aqueous/polar nature the cost of treatment of the contamination would also be significantly lower.

Contamination of Soil

A level of soil remediation might also be required. The most expensive possible option required would be incineration of the contaminated soil, at a cost of EUR€140-210/T, depending on the level and nature of the contaminated soil. Transport overseas to the final disposal destination would cost an additional EUR€40/T. Thus, having to send 600T of contaminated soil for incineration abroad would cost up to EUR€150,000, excluding the cost of excavation.

Contamination of Surface Water

Surface Water contamination could possibly lead to contamination of the adjacent soil and sediment, which could incur costs as discussed above. It might also lead to damage to the local flora and fauna populations, which might require restocking. It is difficult to assess the impact of any polluting incident, but the mitigation procedures in terms of bunding, containment, surface water monitoring and surface water retention all reduce the risk of pollution of surface water to a negligible level.

Conclusion

In the unlikely event of such a pollution incident, based on the maximum quantity of material that could possibly be released, the cost of such remediation as estimated would not exceed EUR€200,000.

5.4 Possible Future Plant Decommissioning & Post Closure Aftercare

SITA Environmental propose to make the following provisions with regard to site closure and decommissioning.

Decommissioning

Disposal of hazardous material held on site

In the event of closure, an environmental liability on site would be the presence of the hazardous materials segregated from the incoming waste and stored in the waste quarantine area. This would require recycling/ disposal at a licensed facility. These materials would be handed over to another licensed waste broker who would arrange their safe transport and recycling/ disposal. The maximum quantity that may be stored on the site is 520 tonnes of hazardous waste. The maximum disposal cost including transport is EUR€670/T, so based on the maximum quantity of material that could possibly be released, the cost of such remediation is estimated not to exceed EUR€348,400.

Cleaning and decontamination of site

All areas that had contained hazardous material would need to be cleaned out thoroughly with all waste and residual waste needed to be collected in sealed containers for disposal at an appropriate facility. The floor and walls will then be washed with suitable detergents and the wash-water on the floor of the contained area will be collected and disposed with the waste and residual waste at an appropriate facility.

Aftercare Plan

The proposed Aftercare Plan for the facility is to convert the premises into a Warehouse Facility. In order to do so comprehensive decommissioning operations will have to be carried out. These will include:

- A sign will be erected at the entrance to the facility, informing people that waste is no longer accepted at the facility.
- All waste at the facility including all recovered wastes, such as recovered waste oil and drums will be dispatched from the site;
- The hydrocarbon waste settlement tank will be decommissioned and may be filled in;
- Sale by auction of decommissioned plant and equipment, which is expected to generate the value of the plant and equipment after allowing for its depreciation in the company accounts. If suitable buyers for equipment cannot be found, or the equipment is in a condition unsuitable for further use, it may be sold as scrap, so that the site is left free of all decommissioned plant, equipment and vehicles.
- All buildings and hardstand areas will be thoroughly swept to remove all loose debris and rubbish and the rubbish is to be disposed of through the proper channels.
- The 3 main waste recovery buildings will then be thoroughly cleaned using steam-cleaning equipment. The cost of steam cleaning the concrete surfaces areas and the interior of the facility buildings would be EUR€50-EUR€70/hour, inclusive of machinery, labour and cleaning chemicals. This would leave the site in a condition free of contamination and available for use as a warehousing facility.
- Specialist Warehousing Contractors will be employed to modify the site and site buildings for use as a modern warehouse facility. The cost of such modifications to the composting extension and waste transfer /recycling buildings in the case of unforeseen closure is estimated not to exceed EUR€500,000.

Conclusion

The site could be adapted into a large warehousing facility/industrial unit or else sold as a going concern. Income generated from the sale of the site and equipment could be used to offset the costs of cleaning and payment of creditors. Hence no liability costs would be associated with decontamination or decommissioning of the site.

6 SUMMARY & FINANCIAL PROVISION

6.1 Summary

This Environmental Liabilities Risk Assessment report has examined current and proposed site activities personnel emergency response training, adherence to on-site procedures, and safety features on site, which will minimise the effect that accidents and emergencies will have with regard to public liability costs and on-site restoration costs.

This report indicates that the risk of environmental liability associated with the site is minimised through good management practices in terms of physical containment and emergency training awareness.

6.2 Financial Provision

In accordance with Condition 12.2.2 of the waste licence for the Integrated Waste Management Facility, a financial provision of €900,000 is provided under the current insurance cover for the facility. The property insurance cover of EUR €6,500,000 includes for fire and special perils on property, machinery, plant, fixtures and fittings. This sum also includes for cover for all stock debris, which is being proposed as a financial provision for any possible environmental liabilities. This provision cover for up to three times the cost of any potential remediation measures required in the event of an impact on the environment.

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