

ATTACHMENT A
NON-TECHNICAL SUMMARY

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Attachment A.1 - Non Technical Summary

As required by Article 12 (1) (u) of the Waste Management (licensing) Regulations, 2004 a non technical summary is provided below which contains information on the matters listed in articles 12(1) (a) to (t) of the regulations.

A.1 Nature of the Facility

This section relates to Article 12(1) (a to e)

This is the Non Technical Summary (NTS) of the Waste Licence Application for a proposed Waste Recovery & Recycling Facility at Unit 643 Greenogue Industrial Estate, Rathcoole Co Dublin (Grid Reference 3023E 2284N). The facility is being developed by Ormonde Organics Limited (OOL), Ballinalacken, Attanagh, Co. Kilkenny (Tel: 056 883 0300, Fax: 056 883 0310). The proposed facility is located in the functional area of South Dublin County Council who is also the relevant sanitary authority for the area.

The facility has been designed to process 45,000 tonnes of (mainly hazardous) hydrocarbon contaminated waste liquids including oily water, interceptor waste, waste oils, tank bottoms, bilge waste, drain cleaning waste, coolants, cutting fluids, fuel oils etc. Acids, alkalines, lime sludge leachate, process wash waters and solid wastes including filters, oily rags, lime sludge and batteries will also be processed. The facility will also be used for the short term storage of contaminated soils in quantities of 50-100 tons at any one time to a maximum of 1,000 tonnes per annum pending transfer to licensed treatment or disposal facilities.

The site presently comprises a warehouse with offices and hard standing yards located in industrial surroundings. The existing building has never been used for its previously permitted logistical use. A planning application and EIS have been submitted to the Planning Department of South Dublin County Council for the redevelopment of the existing site at Unit 643. It is proposed that the hazardous waste recovery and recycling facility will process 11,000 tonnes of wastes per annum initially, rising to 46,000 tonnes after three years. It is proposed that acceptance of contaminated soils will remain constant from year 1 at 1,000 tonnes per annum.

The proposed facility will be the only facility of its kind in Dublin which will process acids, alkalines, spent oil filters and recovers waste oils to a reusable standard. This proposal represents a higher level of treatment than that currently provided at the recycling and recovery providers in the Greater Dublin Region.

The development site (See Figure 1) is located in Greenogue Industrial Estate approximately 2km north of Rathcoole and 2km east of Newcastle in West Co Dublin.

The site measures approximately 0.41 hectares (ha) and its immediate environs are primarily industrial although Greenogue Industrial Estate is set within an agricultural setting between Rathcoole and Newcastle villages. The general topography in the immediate vicinity of the site is low-lying and generally flat at an elevation of approximately 90-100m O.D. The landscape rises sharply to the south of Rathcoole reaching local peaks in the order of 180-200m.

The subject site was granted planning permission in March 2006 (Reg. Ref. SD06A/0035), for a warehouse building and associated yard for the purposes of storage and transshipment of goods. However, although the building has been constructed, the premises have not been used for the permitted purpose.

The facility design, operation and management is fully described in Section 2 of the Main Text of the EIS that accompanies this Waste Licence Application, and on Figures and Drawings that are enclosed in Volume II of the EIS. Any correspondence in relation to this application should be addressed to Mr. Seamus Phelan, Ormonde Waste Ltd, Ballinalacken, Attanagh, Via Portlaoise, Co. Kilkenny.

A.2 Classes of Activity

This section relates to Article 12(1)(f)

In accordance with the Third and Fourth Schedules of the Waste Management Act, 1996 (WMA, 1996) the following classes of activity will be carried out on the site:

The principal activity carried out at the site, as specified in the Fourth Schedule to the Waste Management Act, 1996, is as follows:

"8. *Oil re-refining or other re-uses of oil.*"

Other activities carried out at the site, as specified in the Fourth Schedule to the Waste Management Act, 1996, are as follows:

"2. *Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological processes)*"

"3. *Recycling or reclamation of metals and metal compounds.*"

"4. *Recycling or reclamation of other inorganic materials.*"

"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.*"

The activities carried out at the site, as specified in the Third Schedule to the Waste Management Act, 1996, are as follows:

- "7. *Physico-chemical treatment not referred to elsewhere in this Schedule which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1 to 5 or paragraphs 8 to 10 of this Schedule (including evaporation, drying and calcination).*"
- "11. *Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule.*"
- "12. *Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.*"
- "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.*"

A.3 Quantity and Nature of the Waste to be Disposed

This section relates to Article 12(1)(g)

It is proposed that the maximum amount of waste processed at the facility will be 46,000 tonnes of waste per year. It is expected that this tonnage will be reached within 3 years of commencing operations at the facility. It is expected that approximately 11,000 tpa will be accepted in year 1, 29,000 tps in year 2 and 46,000tpa in year 3.

The proposed facility is designed for the acceptance and treatment of the following main raw materials:

- Oily water and Interceptor wastes
- Waste Oils
- Waste Acids, Alkalines, Lime Sludges, Process Waters
- Tank Bottoms, Bilge Waste and Drain Cleaning Waste
- Spent Oil Filters
- Oily Rags

Contaminated Soils will also be accepted at the facility for temporary storage prior to transfer off site to an appropriate facility.

The European Waste Catalogue codes for the wastes to be treated at the facility are given in Table A.1 below. The specific codes are given and are derived from the general chapter codes as follows 13 (Oil wastes and wastes of liquid fuels), 16 (Wastes not otherwise specified in the list), 17 (C&D Wastes) and 19 (Wastes from waste management facilities).

Table A.1: Waste categories

EWG Code	Waste Classification	Description of Waste	Method of Recovery or Disposal
13 00 00, 05 01 05, 05 01 06	Oil wastes and liquids of liquid fuels	Waste hydraulic oils, emulsions, bilge oils, oily water and interceptor wastes	Decanting ,
16 07 08	Wastes containing oil	waste oily rags, waste oil filters	
16 01 07	Oil filters	Oil filters	polymer addition, flocculation and Dissolved Air Flotation (DAF)
17 05 03, 17 05 05, 17 05 07, 19 13 01, 19 13 03, 19 13 05	Contaminated soils	Contaminated soils	Storage prior to disposal
16 01 14, 16 01 15	Anti-freeze fluids	Coolant	polymer addition, flocculation and Dissolved Air Flotation (DAF)
16 10 00	Aqueous liquid wastes destined for off-site treatment	Acid/ Process waste	polymer addition, flocculation and Dissolved Air Flotation (DAF)
03 03 09, 04 01 02,	Lime wastes	Lime sludges	Polymer addition, flocculation and Dissolved Air Flotation (DAF),
05 01 04	Acid alkaline sludges	Waste acids / alkalines	Polymer addition, flocculation and Dissolved Air Flotation (DAF),

A.4 Raw and Ancillary Materials, Substances, Preparations used on the Site

This section relates to Article 12(1)(h)

The main raw materials used on site are diesel, mains water and electricity. Minor amounts of engine oil and hydraulic oil are used in the day-to-day operation of the facility. Some industrial detergents will be used for cleaning purposes. It is difficult to provide the quantities of these raw materials and substances that will be used in advance of the process. However, it is planned to maintain detailed records of their usage and provide exact figures to the regulatory authorities after three months and annually thereafter.

A.5 Plant Operating Procedures

This section relates to Article 12(1)(i)

The facility has been designed for operation from 08.00 to 18.00 hours Monday to Friday and half day 08.00-14.00 hours Saturdays. The proposed facility will provide direct employment for approximately 4-6 people during its operation with additional numbers employed indirectly.

Plant proposed at the facility include;

The main processing areas will comprise the following:

- **Factory (Process) Building**
 - Waste Oil Process Line
 - Oil Mixes Process Line
 - Acid Alkaline Process Line
 - Utilities
- **Tank Farm**
- **Industrial Storage Building**
- **Weighbridge**

The nature of the proposed activity requires an increase to the size of the existing building on site, which currently consists of approximately 479 sq m of warehouse floor space and 52 sq m of ancillary / office space. The increase is to primarily be in the form of two proposed extensions, as well as some additional ancillary floor space in the existing building.

The larger of these two extensions to the existing warehouse will measure some 36 m long, 18.9 m wide by 9.55 m high (650 sq m) into which deliveries of unprocessed waste (into 3 no. underground sumps) are to be made (prior to pumping into 3 no. above-ground storage tanks (tank farm), also contained within this building).

The second, smaller, extension is approximately 5.4 m long, 7.5 m wide by 8.4 m high (36 sq m), and is to be used for the short term storage of unprocessed waste in bulk containers and empty containers prior to removal off site. Both the proposed extensions are to match the existing building in external finish.

The additional ancillary floor space in the existing building will be in the form of a laboratory at first floor level (14 sq m). Internal modifications consisting of the provision of a kitchen (9 sq m), changing and wash room (13 sq m) and control room (15 sq m) at ground floor level will also be undertaken. The primary use of this building will be for the processing of the waste.

Four bunded storage tanks are proposed. These will measure approximately 4.4 m high with a 5.5 m circumference. A weighbridge and wash bay will also be installed. The layout of the proposed development is shown on Figure 2.

The current access will be retained in its current form to provide access to the site from the link road off the R120 which is under construction.

The proposed facility will be constructed on the existing site and the proposed concreting of the rear yard will be such as to meet the current ground level and maintain the existing run off.

The highest structure on site will be the flue from the boiler in the north western corner of the site at a height of 0.5m above the height of the main processing building. Additional buildings will be no higher than the existing building 9.55m high to the eaves.

The facility has been designed for operation from 08.00 to 18.00 hours Monday to Friday and half day 08.00-14.00 hours Saturdays. The proposed facility will provide direct employment for approximately 4-6 people during its operation with additional numbers employed indirectly.

Wastes accepted at the facility will be subject to prior analytical confirmation, so no special provision is required for reject materials arriving at the facility. An emergency buffer tank is available on site if this situation arose.

The facility will have three fully enclosed segregated intake units for Waste Oils, Oil Mixes and Acids/Alkaline and Process Wastes. Any contaminated soils accepted at the facility will be temporarily stored in covered skips/ packages in the yard to await collection for disposal/treatment.

Wastes are delivered directly from vehicles and containers to the appropriate reception sump. Oils from engine filters are separately extracted in a filter handling sump after crushing of the filter with a standard filter crusher assembly with heating and oil removal facilities; this oil passes into the waste oil intake sump and is transferred forward for processing. Crushed filters are retained in a skip for bulking and periodic removal off-site.

Waste oils are initially passed via a fine screen to a de-emulsifier tank with temperature controlled steam heating. Steam is supplied by a dual fuel (gas-oil) boiler with nominal burner rating of 400 kW (640 kg/h) @ 10 Bar. Oil temperature is then increased to 80°C - 90°C resulting in emulsion breaking and separation. The liquid then passes forward in a two-phase decanter solids separation system followed by a polishing D-type mechanical clarifier unit to maximise water / oil separation. Both separation stages are complete with in-line polymer addition. Separated solids from the decanter are conveyed to a cake skip and separated solids from the clarifier are transferred to the oil mixes balancing tank for processing on this waste circuit. The clean separated oils are pumped to a clean oil holding tank for periodic tanker removal and further distilling / re-use off-site.

For oil mixes, three primary processes namely polymer addition, flocculation and Dissolved Air Flotation (DAF) are proposed for the removal of organics, solid and oils/fats/greases down to concentrations acceptable for disposal of residual waste waters to sewer in combination with the pre-treated acid wastewaters. The wastewater is clarified using dissolved air (at 5 bar pressure) and, on emission, the solids / scum is lifted to the surface and mechanically removed. The unit is fully roofed. Float sludge is taken to a sludge holding tank for periodic passage forward to dewatering by decanter and removal of

solids off site in conjunction with the waste oil solids cake. Effluent overflows from the DAF system via an outfall sewer to a monitoring / sampling chamber upstream of the mains sewer inlet. At this monitoring point flow, pH and temperature are monitored in-line and samples are taken for laboratory analysis. A valved connection is provided to a recycle pump sump, which will facilitate the recycling of unacceptable effluent to the emergency buffer tank for further processing.

Acid wastes are delivered to an intake sump and balancing tank in the same fashion as the oil streams. The tank is equipped with forward pumping via a twin-walled rising main to treatment. The pH will be corrected using Caustic Soda (NaOH) on modulating pH control in a two-stage series flow system. This will ensure that pH will be corrected to a nominal value of 7.0 but all times within the limiting range 6 - 9 for sewer discharge. In the event of unacceptable quality the effluent will be automatically diverted into the dump – recycle pump sump for recycle to the emergency buffer tank. The system will be fully automated and emergency / alarm conditions will be designed during the hazop study.

A.6 Information related to Section 40(4) (a) to (g) of the Act

This section relates to Article 12(1) (j)

A.6.1 Compliance with Emissions

Dust

There are no National or EU standards for dust deposition. By law the plant will be required to be in compliance with Air Pollution Act, 1987. The dust levels measured at the site were below the EPA recommendation of 350 mg/m²/day.

Odours

All emissions from the operational phase of the development were assessed using air dispersion modelling techniques. The results for all parameters modelled were below air quality standards and relevant criteria.

The primary sources of emissions from the site are from the on site boiler and air extraction systems from buildings. Minor sources included fugitive emissions from the waste intake balancing tanks. It is not anticipated that there will be any adverse impacts from odours at the facility.

There are no National or EU standards for odour emissions. In the event of receiving complaints from neighbouring premises with regard to odours, details will be taken on a complaint form and appropriate remedial action will be taken to reduce odour emissions and this action will have regard to the principles of BAT.

Noise

There are no legal limits currently in place for noise emissions from industry. The EPA have set day-time and nighttime guideline limits of LAeq of 55 dB(A) and 45 dB(A) respectively at sensitive locations at other waste management facilities that have been licensed. A comprehensive quantitative assessment of the potential noise impacts resulting from the construction and operation of the proposed development was conducted as part of the Environmental Impact Assessment. This assessment has shown that no adverse impacts will occur as a result of the proposed development.

Water

The risk to the groundwater posed by the activities at the site is considered insignificant and no groundwater monitoring is proposed.

The potential impacts of the development on the surface water environment are limited as the surface water bodies in the environs of the site are culverted.

The proposed surface water drainage system on site has been designed to deal with any precipitation falling on site, even during flood events. Surface water runoff from all hard standing areas at the facility will be directed to the surface water collection system, through a silt trap and class 1 klargester petrol interceptor and then discharged via a storm water attenuation tank to the main storm water sewer along the western boundary of the site.

Roof drainage from buildings will also be drained via silt trap and interceptor prior to the 166m³ storm water attenuation tank, and into the storm water drainage system. The storm water attenuation tank has been conservatively designed to handle all storm events up to a 100 year flood event. Flow from the attenuation tank will be restricted to 2 litres per sec.

Potential impacts as a result of the proposed development could include run-off from bare earth surfaces during construction phase as well as spillages/leaks from the process creating hydrocarbon or other contaminated waters. Fire fighting water runoff also has the potential to impact in the event of a fire. Mitigation measures are proposed to deal with these eventualities.

A.6.2 Environmental Pollution

The design and operating practices that ensures that environmental pollution is avoided are listed below.

Risk to Waters is avoided by:

- All surface run-off from the site will be drained to the existing surface water drainage network via silt trap interceptor and attenuation
- All oils/fuels or other hazardous substances stored on site will be stored in bunds

- Sewage or effluent from site uses will be directed to the existing foul water drainage system. Where modifications are occurring to the foul drainage system (e.g. during construction phase) portaloos will be provided.
- Surface water run-off from all hard standing areas including roofs will be collected into the surface water drainage system and attenuated. A storm water attenuation lagoon with a capacity 166m³ and a restricted outflow of 2 litres/second
- All fuel oils or other hazardous substances will be stored in tanks located in bunds.
- An emergency response procedure will be implemented in the unlikely event of a large scale leakage or spillage on site. This will include immediate containment procedures, contacting relevant authorities and employing specialist consultants to remediate the spill
- Unloading and processing of the wastes will be undertaken internally under a roofed area.
- Any firewater generated by a fire event will be contained within the bunding built into site buildings or by the low kerbing around the site perimeter. Once any potential fire has been dealt with firewater can be pumped to temporary storage or directly to tankers for disposal.
- The site is covered with a concrete slab and therefore there will be no direct discharges to groundwater.

Risk to the Atmosphere is avoided by:

- Implementation of a regular and documented maintenance and inspection programme for all plant equipment
- On-site good house keeping and raw material handling practices will be stringently controlled through agreed protocols
- Preparation of an odour management plan to ensure odour emissions are minimized
- Regular internal and external odour patrols
- Scrubbing units (charcoal or other appropriate abatement) will be installed on all 3 balancing tanks to remove odorous or organic emissions
- The process will be fully contained, well ventilated and each intake tank will be sealed
- All buildings will be completely enclosed with high speed roller shutter doors to prevent fugitive releases to atmosphere
- Air will be extracted at a rate of 4 air changes per day
- If required following delivery, vehicles will be washed in the wash bay to remove any residual waste material

Risk to Land, Soil, Plants or Animals is avoided by:

- All effluents, grey water and truck washes will discharge to foul sewer.
- All waste oil, empty oil containers and other hazardous wastes are disposed of in conjunction with the requirements of the Waste Management Act 1996.
- Risk to land and soil beneath the site is avoided by the same controls that avoid risk to Waters as described above.
- Risk to plants and animals are avoided by location of the development removed from areas of special ecological importance. The flora and fauna in the vicinity of the site are not considered sensitive to the site activities.

Nuisance through Noise, Odours or Litter is avoided by:

- All wastes will be handled inside a contained building and all vehicles carrying wastes to the site will be covered.
- Daily litter patrols will be carried out at the site.

These pollution control measures will also have the effect of reducing the nuisance of dust emissions from the site.

Adverse effects on the country side or places of interest are avoided by:

- Operating the site with adequate environmental controls.
- The facility is located in an industrial estate at a remove from the countryside and any places of interest.

The activity concerned does not entail the landfill of waste.

A.6.3 - Best Available Technology

With respect to Ormonde Organics Ltd (OOL), the principle of employing BAT will be applied in respect to emissions as follows.

OOL will employ modern management practices and commit financial resources in order to control all nuisance emissions and ensure protection of the environment.

The company intend to purchase and install state of the art recovery plant and equipment at the newly constructed facility. The equipment will include a fully enclosed systems from unloading the tankers with waste liquids, right through processing to final export of recovered wastes or treated effluent disposal.

Abatement systems will include the design of the overall buildings, structures and plant, carbon filters on the reception tanks, an air handling system for the processing building, rapid action open/close doors, silt traps, oil interceptors, stormwater attenuation tank, bunded tanks among others.

Specialist consultants will be retained as required to monitor potential nuisances and emissions and all relevant environmental media as may be set out by the EPA. The consultants will inform the company on a regular basis of improvements in pollution abatement or other relevant technology. The costs of the facility and adhering to the modern management practices will be paid for out of OOI's annual revenues.

The proposed recovery activity is consistent with the policies, aspirations and objectives of the Waste Management Plan for the Dublin region.

A.6.4 Fit and Proper Person

The applicants are fit and proper persons to hold and operate a waste licence. As stated in Section L.2, no employee of Ormonde Organics Ltd. has been convicted of an offence under the Waste Management Act 1996 or other prescribed acts under this section.

As outlined in Section L.2, the management team at Ormonde Organics Ltd. have abundant experience in this area. The general managers will be responsible for environmental aspects of the operation and compliance with the waste licence. They will be assisted by an environmental technician.

A.6.5 Financial Provision

Financial commitments may be required to cover decommissioning, aftercare management and environmental pollution. The Company's sound financial position and its ability to cover the cost of environmental issues at the site are outlined in Section L.2.

A.6.6 Energy Usage

Energy will be used efficiently at the facility. It is proposed to carry out an energy audit after the site is fully operational and this will help in controlling energy usage at the site.

A.6.7 Noise Emissions

Noise emissions from the facility will comply with all noise regulations under section 106 of the Act of 1992.

A.7 Emissions

This section relates to Article 12(1)(k)

The potential emissions from the facility are divided into emissions to air, groundwater, surface water and noise emissions.

Emissions to Air

The main potential emissions from the operation of the facility are odours from the main process building and oxides of nitrogen, nitrogen dioxide and carbon dioxide from the boiler. See Section 10 of the EIS for further details and mitigation measures.

Emissions to Groundwater

There are no foreseen emissions to ground water from the operation of the facility. See Section 7.6 of the EIS for further details.

Emissions to Surface Water

The proposed storm water drainage system on site will be designed to deal with any precipitation falling on site, even during flood events. Surface water runoff from all hardstanding areas at the facility will be directed to the surface water collection system, through a silt trap and class 1 klargester petrol interceptor and then discharged via storm water attenuation to the main storm sewer along the western boundary of the site.

Roof drainage from buildings will also be drained via silt trap and interceptor prior to the 166m³ storm water attenuation tank, and into the storm water drainage system. The storm water attenuation tank has been conservatively designed to handle all storm events up a 100 year flood event. Flow from the attenuation tank will be restricted to 2 litres per sec. See Section 8 of the EIS for further details.

Foul water from the staff facilities at the site (washrooms, canteen) will be discharged to the main foul sewer servicing the industrial estate. Treated effluents from the main processing streams will be monitored and controlled prior to discharge to the main foul sewer.

Noise Emissions

The production process will be the main noise contributing source from the internal area of the process. Other contributors will include boilers, pumps and noise generated from the production process itself.

These sources are in enclosed buildings and their doors will be opened only to permit access and deliveries. There are also rapid roller shutter doors which close immediately after any lorries exit the building. As such, there will be little potential to give rise to any significant noise impact at noise sensitive receptors.

A.8 Assessment of the Effects of Emissions on the Environment

This section relates to Article 12(1)(l)

The EIS describes the potential impacts, mitigation measures and likely significant effects on the environment from the site activities including activity related emissions. This concludes that the proposed development at the site will not impact significantly on the environment. The main reasons for there being little or no impact from the development include the following (briefly): The relatively small scale of activity; the location of the activity (i.e. in an industrial estate and not close to any large residential or other environmentally sensitive area; site containment i.e. all activities on site will be carried out inside a completely contained building thus significantly reducing potential impacts on visual amenity, noise, dust, water quality etc.; the many mitigation measures included in the design to reduce emissions and potential impacts on the environment and many more. The proposed development has been designed and engineered with many mitigation measures in place to eliminate or reduce potential impacts on the environment and this is reflected in the conclusions of the EIS. It is considered that given these circumstances and in particular the location (industrial area removed from residential areas) and design of the facility that there will be no significant impact on the environment. Abatement equipment and mitigation measures are outlined in earlier sections of this non technical summary (A.6 and A.7 above).

A.9 Monitoring and Sampling Points

This section relates to Article 12(1)(m)

The proposed monitoring programme is as follows:

Dust	-three times a year (twice in summer and once in winter)
Noise	-annually
Surface Water Discharge	-quarterly
Foul Water Discharge	-daily for relevant control parameters.

It is suggested that the monitoring locations will be designated by the EPA in the waste licence should it be granted.

A.10 Site Generated Wastes

This section relates to Article 12(1) (n)

Wastes generated by the activity itself will be minimised. The company will prevent the generation of wastes by ordering supplies in bulk to reduce packaging, by not over-ordering and using take back schemes where applicable. The facility itself will provide separate receptacles for the segregation of any wastes produced on site. All residual wastes that cannot be recycled will be disposed of at licensed landfill sites.

A.11 Off-site Treatment or Disposal of Wastes

This section relates to Article 12(1) (o)

Wastes treated at the facility will consist in the main of oily waters, acid/alkaline process waters, oil filters, and oily rags. These will be processed to produce reusable oils and metals for metal recycling. The acid alkaline process waters will be pH adjusted. The process will generate wastes and effluent. The wastes will be exported off site for treatment and/or disposal at appropriately licensed facilities. The treated effluent will be discharged to the foul sewer under conditions to be stipulated in the waste licence if granted. Contaminated soils will be periodically stored at the facility in small quantities and in skips or bags/packets. These will be transported to suitably licensed facilities for treatment and/or disposal.

A.12 Emergency Procedures to prevent Unexpected Emissions

This section relates to Article 12(1)(p)

An emergency response procedure (ERP) has been formulated for the facility and this will be followed in the unlikely event of any unexpected spills, leaks or emissions. The ERP details the procedures to be followed and includes shutting down the emission point if possible, provision and utilisation of oil spill kits, containing the emission, notification of management and relevant bodies and remediation of spills/leaks should they occur among others. In addition, shut off valves will be installed on both the storm drainage system and the foul water system so that all liquid emissions can be isolated and controlled on site.

A.13 Closure, Restoration and Aftercare of the Site

This section relates to article 12(l)(q)

Operations at the facility are ongoing with an open ended life span and to date a closure plan has not

been developed. In the event of the closure of the facility a detailed closure plan will be developed with the agreement of the Agency. The plan will include for the removal of all waste materials, raw materials, products and effluents, emptying and cleaning of all plant, equipment, the building floors and yards, removal and dismantling of all plant and equipment (if not sold on to a prospective buyer) and the carrying out of a detailed monitoring programme to certify that all emissions from the plant have ceased.

A.14 In the case of an application for the Landfilling of waste

This section relates to article 12(l)(r)

This application does not relate to the landfilling of waste

A.15 Control of Major Accident Hazards Involving Dangerous Substances Regulations

This section relates to article 12(l)(s)

The European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2000 (S.I. No. 476 of 2000) do not apply to this activity.

A.16 Activities giving rise to an emission to an aquifer of List I or List II substances

This section relates to article 12(l)(t)

The site is designed as a fully contained site with concrete base, lower concrete walls in the building and all activities will be carried out inside the building. In addition, all storage and treatment processes are in bunded tanks and fully enclosed pipe/treatment systems. The activity will not give rise to the emission of any contaminants including List I and List II substances and there will be no direct or indirect discharges to an aquifer.