



epa
Environmental Protection Agency
An Ghníomhaireacht um Chaomhú Comhshaoil

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2nd October 2007

Reg No: W0237-01

Dear Sir/Madam

I am to advise you that the Agency has received an application for a Waste Licence from Ormonde Organics Limited, for a facility located at Ormonde Organics Limited, Unit 643, Greenogue Industrial Estate, Rathcoole, County Dublin.

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

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


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



In accordance with paragraph (2) of this section of the Act, you are requested to forward your response within 4 weeks of the date of this letter. Please note that any decision given after the expiry period shall be invalid and in those circumstances the Agency may proceed to determine the application concerned as if consent was obtained. Stuart Huskisson is dealing with this matter and can be contacted at the Licensing Unit, Office of Climate, Licensing & Resource Use, Richview, Dublin 14 Tel. No. 01 2680100 if you have any queries.

Your co-operation in this matter is appreciated.

Yours sincerely,



Josephine Kennedy
Programme Officer
Licensing Unit
Office of Climate, Licensing & Resource Use

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

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

SANITARY AUTHORITY RESPONSE

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

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

Waste Reg. No. W0237-01

Waste Facility: Ormonde Organics Limited, Unit 643, Greenogue
Industrial Estate, Rathcoole, County Dublin

Waste Licence Applicant: Ormonde Organics Limited

Consent: Indicate Yes to one of the following statements:

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

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

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

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Waste Licence application Register No. **W0237-01**

Emission Point Reference No: _____

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

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

Signed on behalf of South Dublin County Council

_____ Date _____

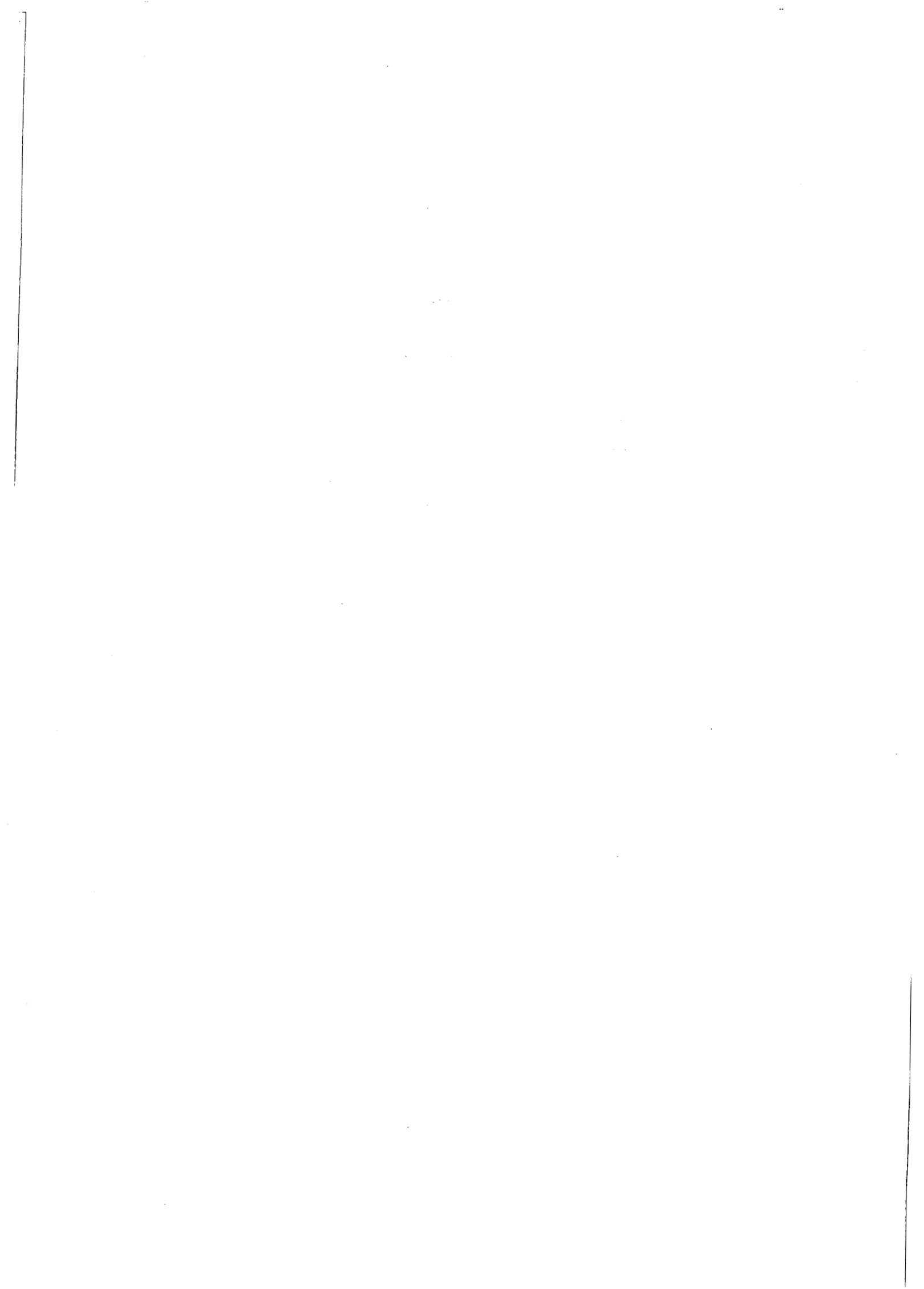


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B.4 Sanitary Authority

In the case of a discharge of any trade effluent or other matter (other than domestic sewage or storm water) to a sewer of a sanitary authority or other body, give the name of the sanitary authority in which the sewer is vested or by which it is controlled and the waste water treatment plant (if any) to which the sewer discharges.

Name:	Environmental Services Department
Address:	South Dublin County Council
	County Hall
	Tallaght
	Dublin 24
Tel:	01 414 9000
Fax:	

The applicant must enclose, as **Attachment B.4**, a copy of any effluent discharge licence and/or agreement between the applicant and the body with responsibility for the sewer.

B.7 Type of Waste Activity, Tonnages & Fees

B.7.1 Specify the class or classes of activity in Table B.7.1, in accordance with the Third Schedule or Fourth Schedule to the Waste Management Acts 1996 to 2003, to which the application relates (check the relevant box(es) and mark the principal activity with a 'P').

Attachment B.7 should identify the principle activity and include a brief technical description of each of the other activities specified. There can only be one principal activity.

TABLE B.7.1 THIRD AND FOURTH SCHEDULES OF THE WASTE MANAGEMENT ACTS 1996 TO 2003

Waste Management Acts 1996 to 2003			
THIRD SCHEDULE Waste Disposal Activities	Y/N	FOURTH SCHEDULE Waste Recovery Activities	Y/N
1. Deposit on, in or under land (including landfill).		1. Solvent reclamation or regeneration.	
2. Land treatment, including biodegradation of liquid or sludge discards in soils.		2. Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological processes).	X
3. Deep injection of the soil, including injection of pumpable discards into wells, salt domes or naturally occurring repositories.		3. Recycling or reclamation of metals and metal compounds.	X
4. Surface impoundment, including placement of liquid or sludge discards into pits, ponds or lagoons.		4. Recycling or reclamation of other inorganic materials.	X
5. Specially engineered landfill, including placement into lined discrete cells which are capped and isolated from one another and the environment.		5. Regeneration of acids or bases.	
6. Biological 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 7 to 10 of this Schedule.		6. Recovery of components used for pollution abatement.	
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).	X	7. Recovery of components from catalysts.	
8. Incineration on land or at sea.		8. Oil re-refining or other re-uses of oil.	P
9. Permanent storage, including emplacement of containers in a mine.		9. Use of any waste principally as a fuel or other means to generate energy.	
10. Release of waste into a water body (including a seabed insertion).		10. The treatment of any waste on land with a consequential benefit for an agricultural activity or ecological system.	
11. Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule.	X	11. Use of waste obtained from 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.	X	12. Exchange of waste for 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.	X	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.	X

TABLE B.7.2 MAXIMUM ANNUAL TONNAGE

The maximum annual tonnage of waste to be handled at the site should be indicated and the year to which the quantity relates indicated.

Maximum Annual Tonnage (tpa)	46,000 tonnes/annum
Year	2010

F.4 Sewer Discharge

Monitoring of sewer discharge shall be carried out at the point specified by the local authority/Agency.

Monitoring Arrangements specified	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	not applicable <input type="checkbox"/>
Monitoring points identified, (plus 12-figure grid references)	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	not applicable <input type="checkbox"/>
Attachment included	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	not applicable <input type="checkbox"/>

TABLE E.3(i): EMISSIONS TO SEWER(One page for each emission)

Emission Point:

Emission Point Ref. N ^o :	
Location of connection to sewer :	See Drawing No. 04,
Grid Ref. (10 digit, SE,5N):	
Name of sewage undertaker:	

Emission Details:

(i) Volume to be emitted			
Normal/day	m ³	Maximum/day	150m ³
Maximum rate/hour	20m ³		

(ii) Period or periods during which emissions are made, or are to be made, including daily or seasonal variations (*start-up /shutdown to be included*):

Periods of Emission (Avg)	_____min/hr _____hr/day ____day/yr
	Emission will occur during normal operating hours only. See Attachment C.3

TABLE E.3 (ii): EMISSIONS TO SEWER - Characteristics of the emission (1 table per emission point)

Emission point reference number: F3.0

See Table E.2 of Attachment E

Parameter	Prior to treatment				As discharged				% Efficiency
	Max. hourly average (mg/l)	Max. daily average (mg/l)	kg/day	kg/year	Max. hourly average (mg/l)	Max. daily average (mg/l)	kg/day	kg/year	

Attachment E – Emissions

Attachment E1 Emissions to Atmosphere

Please refer to:

Section 10.8 *Potential Impacts* of the EIS

Attachment E2 Emissions to Surface Waters

Please refer to:

Section 8.2 *Surface Water* of the EIS

Attachment E3 Emissions to Sewer

Please refer to: Section 8.2.3 *Mitigation Measures* of the EIS.

The treatment processes at the site entail advanced technology and methodologies for separating out oil from water and for adjusting/neutralising acid/alkaline mixtures. The recovered oil products will be forwarded to suitable facilities for further treatment and/or reuse. The remaining water will be discharged to the foul sewer as an effluent. The quantity of effluent is difficult to determine at this point and will be highly dependent on the nature of the incoming liquids and the concentrations of oils in the incoming liquids. However, it is possible that there could be up to 40,000 m³ per annum of effluent generated at the facility though it is considered that the actual figure will be much less than this. Table E.1 details the predicted loading on the facility. The effluent will generally discharge to the foul sewer on an ongoing basis and therefore there will not be any surges to the sewer. The quality of effluent to be discharged will be similar to other plants of this nature operating in the country and will meet the requirements of South Dublin County Council and the Agency. Table E.2 below gives indicative composition of the effluent proposed.

Table E.1: Predicted Loading - Annual Waste Throughput:

Waste Type	(1) Heavy Oils	(2) Light Oils	(3) Acid / Process
Year 1 m ³ p.a.	4,500	5,500	0
Year 2 m ³ p.a.	8,000	10,500	0
Year 3 m ³ p.a.	12,000	12,000	4,000
Year 4 m ³ p.a.	12,500	14,500	6,500
Year 5 m ³ p.a.	18,000	18,000	9,000
Max. m ³ p.a.	18,000	18,000	9,000
Design Value m ³ p.a.	20,000	20,000	10,000
Daily (@ 250 d p.a.) m ³	80	80	40
Hourly Design m ³ (i.e. 2 x 4 m ³ /hr)	8	8	4

Table E.2: Emissions to Sewer
Proposed Effluent composition (FOUL ONLY):

Max Hourly Flow	m ³		20
Max Daily Flow	m ³		150
BOD Concentration	mg/l	Mean	800
		Max.	1,200
COD Concentration	mg/l	Mean	1,650
		Max.	2,500
Suspended Solids	mg/l	Mean	400
		Max.	500
pH		Range	6 - 9
Temp.	°C	Mean	35
		Max.	50
Oils / Fats / Greases	mg/l	Mean	150
		Max.	200
Copper	mg/l	Mean	3
		Max.	5
Iron	mg/l	Mean	10
		Max.	15
Lead	mg/l	Max.	0.5
Tin	mg/l	Max.	2
Zinc	mg/l	Max.	5
Chromium	mg/l	Max.	15
Mercury	mg/l	Max.	0.1
Sulphates	mg/l	Mean	400
		Max.	600
Total Nitrogen	mg/l	Mean	75
		Max.	100
Total Phosphorus	mg/l	Mean	25
		Max.	35
Chlorides	mg/l	Mean	2,500
		Max.	3,500
Detergents	mg/l	Max.	100
Phenols	mg/l	Max.	15

In this regard it is proposed to monitor the effluent on a regular basis to ensure that it meets the quality requirements. Monitoring will be conducted on the effluent prior to discharge to the foul sewer. It is expected that any conditions/controls/monitoring that would normally be included in a discharge licence from the local authority will be detailed in the Waste Licence.

Attachment F1 Treatment, Abatement and Control Systems

The entire process has been designed to treat liquids and sludges consisting in the main of oily waters, interceptor wastes, bilge waters, acid/alkaline wastes etc. which inherently provides substantial treatment and abatement to the wastes in question. These systems are detailed in section 2.2.3 of the EIS. In addition, there are a range of other abatement technologies planned at the facility which will reduce emissions from the processes and include the following:

- Carbon filters on the intake tanks
- An air handling system in the main building
- pH adjustment/neutralisation of the process effluents
- Regular monitoring of the process effluent to ensure that the effluent meets requirements prior to discharge to the main foul sewer.
- Full containment of all processes inside the main building to prevent/reduce visual intrusion, noise and dust emissions
- Washbay with silt trap and oil interceptor for trucks
- Proposed sweeping and washing of site yard and access roads
- Silt trap, oil interceptor and stormwater attenuation tank for rainfall run-off from the open yard
- Full containment of the facility with concrete slab to prevent direct discharges to groundwater

Attachment H – Material Handling

Attachment H1 Waste Types and Quantities

Please refer to Section 2.2.3.1 *Description of Principle Process or Activities* in the EIS.

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. Oil filters are accepted for processing in the area adjoining the main process building and waste fuel oil intake. Oily rags will also be treated at the proposed facility. All waste intakes will be housed in the additional building to be constructed at the rear of the existing warehouse.

Waste Oils Processing

Waste oil is brought to site primarily in bulk tankers but may also arrive in the form of containers, cans and used oil filters. Design loading and related process parameters are summarised as follows:

Ultimate Annual Intake	m ³	18,000
Design Processing Capacity	m ³ p.a.	20,000
Design Daily Capacity	m ³ / day	80
Design Hourly Capacity - Phase 1	m ³	4
- Phase 2	m ³	4
Inlet Pumping (Duty / Standby)	m ³ /hr	5
Balancing Capacity	m ³	100
No. of Process Lanes (Ultimate)	-	2
Capacity per Lane	m ³ /hr	4
Service Water Demand, Max	m ³ /d	10
Resulting Products:		
: Clean Oil (Recycle)	m ³ /d	20
: Wastewater (to Oil Mixes Process Line)	m ³ /d	60 max.
: Sludge Cake	t/d	8.0 max.

Waste oils are delivered directly from vehicles and containers to the 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 above intake sump and is transferred forward. Crushed filters are retained in a skip for bulking and periodic removal off-site.

Raw oils are pumped into a balancing tank (bundled and roofed) with mixing and forward feed pumps. The fuel is 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. Boiler water will be pre-treated for boiler application. Emissions from the boiler are further detailed in Section 13 of the EIS "Air Quality". At this stage oil temperature is 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.

Oil Mixes Processing

The relevant raw loading and heavy oil pre-treatment overflows are summarised as follows:

Design Flow Oil Mixes	m ³ p.a.	20,000
Daily Equivalent	m ³ / day	80
Forward Flow from Waste Oil Processing	m ³ / day	60
Local Washings	m ³ /d	20
Total for Treatment	m ³ /d	160
Design Hourly Flow, Max	m ³	25
Max Treated Outfall to Sewer	m ³	200
Max Sludge (Float) for Decanter Dewatering	m ³ /wk	5

This waste stream again arrives predominantly in bulk tankers however IBC's and other acceptable containers will also occur. Waste carrying vehicles will be directed via the weighbridge, to unload at the inlet pump sump. Liquids are pumped to the balancing tank which is complete with roofing, bunding and mixing. The reception / pump sump is complete with a grit / silt removal facility and grit will be periodically removed and stored for off site disposal. From the balancing tank the wastewater is pumped to in-line treatment for disposal.

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 the 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 Alkaline (& Process) Waste Processing

The raw wastewater loading and related parameters for acid wastes are as follows:

Annual Load (Ultimate)	m ³	9,000
Daily Load	m ³	40
Balancing Capacity	m ³	100
Hourly Flow rate	m ³	4
pH Rate - Inlet		2 - 6
pH Rate - Outlet		6 - 9

These wastes will be received in a similar manner to the other categories and will be accepted at the inlet sump and balancing tank at the waste intake building. 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.

Surface and Foul Water Management

The proposed surface and foul water management systems are detailed in Section 8. Wastewater and process effluent generated at the facility will be discharged to public foul sewer.

It is anticipated that the wastewater generated by the toilet, canteen and washing facilities will represent an approximate PE of 10 and the daily volume generated is calculated at just under 2 m³. This wastewater will be discharged directly to the main foul sewer.

De-sludging

De-sludging of tanks and inlet sumps will be required on a regular basis. The process of tank de-sludging will be detailed in the facility Standard Operating Procedures (SOP's). Any desludged materials which are not suitable for reuse in the process will be transferred for disposal at an authorised facility.

Monitoring

Environmental monitoring undertaken as part of the EIS is discussed in individual Sections (4-16). The facility will have regular monitoring which will be documented in the SOPs and the EPA licence. In line monitoring systems will be provided to ensure that unsuitable effluents are returned to the emergency buffer tank for reprocessing.

Security

Site security will be provided by a combination of suitable infrastructure and security personnel.

A record will be kept of all visitors to the site. Visitors will be monitored and supervised at all times. Security personnel will be employed to provide security during the hours of operation. The phone numbers of all emergency services will be clearly posted adjacent to all fixed line phones on site.

3.12 WASTE MANAGEMENT

During the construction phase both solid and liquid waste will be produced on the site. Minor quantities of liquid waste produced during the construction phase such as waste oils, solvents and paints will be stored in a temporary bunded area prior to transport off site by a licensed contractor.

During the construction phase all domestic effluent generated on site will discharge to the pre-existing foul drainage system. Where the foul water system is unavailable during its modification Portaloos will be provided.

It is not envisaged that there will be any significant spoil materials arising from the construction, as any excavated soil will be re-used as part of the construction process. Hardcore arising from the rear yard will be reused where possible. All solid waste generated during the construction phase will be adequately segregated and stored prior to transfer to an authorised facility for recovery/recycling/disposal.

8.2.2 Sources of Contamination

The potential sources of surface water contamination include the following:

- Spills from vehicle unloading,
- Hydrocarbon spills from fuel storage tanks or vehicles,
- Washdown from the washbay, yard and building,
- Contaminated firewater.
- Sewage Management
- Surface Water Discharges

8.2.3 Mitigation Measures

Unloading spillages

All liquid wastes will be transported to the site in enclosed vessel carrying vehicles. All soils accepted at the facility will be in covered or enclosed containers. Wastes to be processed will be handled inside the waste intake building. This will prevent any spillages combining with surface water and escaping to the drainage system.

Hydrocarbon Spill

All tanks whether located at the intakes, as part of the process or post process will be contained within concrete bunded structures. The bunded areas will be constructed to 110% of the largest tank. All inlets, outlets, vent pipes and valves will be contained within the bunded area. All vehicles serving the site will be well maintained and are unlikely to suffer any significant losses in normal operation. Where small leakages do occur these will be collected by the regular surface water drainage network and removed in the silt trap/interceptor system.

Building/Vehicle/Yard Washdown

Surface water drainage from all hardstanding areas at the facility will be directed to the surface water collection system which discharges to the storm sewer via a silt trap and klargester interceptor followed by storm water attenuation. The washbay will drain to a dedicated klargester and silt separation system and to foul sewer. The overflow from the storm water attenuation system will outfall to the storm sewer at a restricted rate of 2 litres per second. Water held in the storm water attenuation tank can where necessary

be used for site operations such as floor washing or used for firefighting in the event of a potential fire. The surface water management system will be equipped with an automatic and manual closure device located prior to the discharge point to the surface water network which is operated from the administrative building.

The process buildings have been constructed with low bund walls to ensure full containment in the unlikely event of a spillage or fire event. The main entrance to the facility has been designed with a graded ramp in addition to low kerb bunding around the yards thus allowing for full containment of any spillages. Please refer to Drawing No 4 and 15 of Volume 2 of the EIS "Engineering Drawings". The foul water management system will also be equipped with an automatic and manual closure device located prior to the discharge from the facility, which will be operated from the administrative building.

Contaminated Firewater

The main process building has been designed with bunding for firewater/spill retention within the process floor. All yards are constructed with low bund kerbs to contain any spillages. In the event of a fire at the facility the foul and surface water systems may be shut off by automatic and manual closure devices controlled from the site office, should this be required. This will ensure contaminated waters are retained pending their collection for disposal to a suitable site.

Sewage Management

Foul water generated by the process and all toilet and canteen facilities will be directed to the western margin of the facility to the local authority foul water collection mains. Discharge to the foul sewer will be subject to the discharge license to be sought as part of the waste licence for the facility. Any unsuitable effluent generated by the process as determined by the in line effluent monitoring system will be returned to the emergency buffer tank for further processing. The foul water management system will be equipped with an automatic and manual closure device located prior to the discharge from the facility, which will be operated from the administrative building.

8.2.4 Likely Significant Effects

With the mitigation measures described above in place, the impact from the site on the surface water environment is expected to be insignificant.

ATTACHMENT A.1
NON-TECHNICAL SUMMARY

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

EWC 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) portals 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 klargestel 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(I)(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(I)(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(I) (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.