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environmental solutions

Environmental Protection Agency
Licensing
 Received
28 DEC 2007
 Initials _____

For the Attention of
 Waste Licensing Section
 Environmental Protection Agency
 PO Box 3000
 Johnstown Castle Estate
 Co. Wexford

Our Ref.: W0129-02/LOD/201207
 Direct Dial: 01 802 0523
 Direct Fax: 01 802 0525
 Mobile: 086 8333724
 e-mail: louise.odonnell@pateltonra.com
 Date: 20th December 2007

ENVIRONMENTAL PROTECTION
 AGENCY
28 DEC 2007

Dear Sir/Madam,

Waste Licence:	W0129-02 Hollywood Great
Re.:	Objection to Proposed Decision, Licence Register W0129-02
Enclosed Docs:	Cheque

In relation to Proposed Decision (PD), Licence Register W0129-02 for Hollywood Great, signed by the Agency on 27th November 2007, we wish to submit the following objection.

Name and Address of Objector

Ms Patricia Rooney, General Manager,
 Murphy Environmental (a trading division of Murphy Concrete Manufacturing Ltd.),
 Hollywood,
 Nag's Head,
 Naul,
 Co. Dublin

Agent for Murphy Environmental

Patel Tonra Ltd., Environmental Consultants to Murphy Environmental (M.E.), is acting on behalf of Ms Patricia Rooney in lodging this submission. Contact details for Patel Tonra Ltd. are:

Ms Louise O'Donnell, Senior Consultant,
 Patel Tonra Ltd.,
 3f, Fingal Bay Business Park,
 Balbriggan,
 Co. Dublin

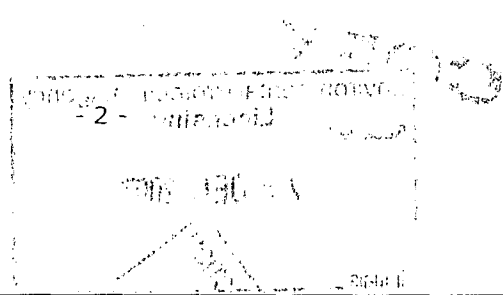
Subject Matter of the Objection; Grounds of objection and reasons, considerations and arguments on which they are based

Murphy Environmental proposes that a number of conditions in the PD for W0129-02 are not relevant to an inert facility such as Hollywood. Each of the contested conditions is outlined in the Table overleaf, with stated grounds for the objection.

Fee for Objection

Please find enclosed a cheque payable to the Agency for €500 for an objection lodged by the licensee.

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W0129-02 Condition	Murphy Environmental Objection
<p>2.2.2.2 Schedule of Environmental Objectives and Targets The licensee shall maintain a Schedule of Environmental Objectives and Targets. The schedule shall as a minimum provide for a review of all operations and processes, including an evaluation of practicable options, for energy and resource efficiency, <u>the use of cleaner technology, cleaner production, and the prevention, reduction and minimisation of waste, and shall include waste reduction targets..</u></p>	<p>M.E. are ISO14001-accredited and maintain an ongoing register of 'Aspects and Impacts' and 'Objectives and Targets', however many of the issues appear to relate to industrial-type facilities (specifically the underlined section), rather than an inert landfill and are therefore not perceived to be relevant at Hollywood.</p>
<p>2.2.2.9 Efficient Process Control The licensee shall maintain a programme to ensure there is adequate control of processes under all modes of operation. The programme shall identify the key indicator parameters for process control performance, as well as identifying methods for measuring and controlling these parameters. Abnormal process operating conditions shall be documented, and analysed to identify any necessary corrective action.</p>	<p>These issues appear to relate to industrial-type facilities, rather than an inert landfill. The major 'process' at Hollywood is landfilling of inert waste – parameters for process control do not apply.</p>
<p>3.12 The licensee shall install on all emission points such sampling points or equipment, including any data-logging or other electronic communication equipment, as may be required by the Agency. All such equipment shall be consistent with the safe operation of all sampling and monitoring systems.</p>	<p>This is not considered applicable at the Hollywood facility. The only emissions are at Surface Water Discharge (SWD) points, which are in operation intermittently and are included in the quarterly sampling round. The installation of fixed monitoring equipment is not proposed.</p>
<p>3.13 In the case of composite sampling of aqueous emissions from the operation of the facility a separate composite sample or homogeneous sub-sample (of sufficient volume as advised) should be refrigerated immediately after collection and retained as required for EPA use.</p>	<p>Only discrete sampling techniques are employed at Hollywood.</p>
<p>3.17 All pump sumps, storage tanks, lagoons or other treatment plant chambers from which spillage of environmentally significant materials might occur in such quantities as are likely to breach local or remote containment or separator, shall be fitted with high liquid level alarms (or oil detectors as appropriate) within 3 months from the date of grant of this licence.</p>	<p>The oil interceptor is fitted with an alarm, however alarm systems are not considered appropriate for bunds and other containment systems on site.</p>
<p>3.18 The provision of a catchment system to collect any leaks from flanges and valves of all overground pipes used to transport material other than water shall be examined. This shall be incorporated into a schedule of objectives and targets set out in Condition 2.2.2.2 of this licence for the reduction in fugitive emissions.</p>	<p>No overground pipes are installed or proposed at the Hollywood facility.</p>

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W0129-02 Condition	Murphy Environmental Objection
<p>3.19 The licensee shall maintain in a prominent location on the site a wind sock, or other wind direction indicator, which shall be visible from the public roadway outside the site.</p>	<p>This condition is objectionable on the basis that there is potential for visual intrusion associated with the installation of a wind sock, in what is designated a high amenity landscape. It is also considered that a wind sock could be alarmist for neighbours and passers-by.</p>
<p>4.1 Emission limit values for emissions to waters in this licence shall be interpreted in the following way: 4.1.1 Continuous Monitoring (i) No flow value shall exceed the specified limit. (ii) No pH value shall deviate from the specified range. (iii) No temperature value shall exceed the limit value. 4.1.2 Composite Sampling (i) No pH value shall deviate from the specified range. (ii) For parameters other than pH and flow, eight out of ten consecutive composite results, based on flow proportional composite sampling, shall not exceed the emission limit value.</p>	<p>No continuous monitoring or composite sampling is proposed at the Hollywood facility.</p>
<p>4.2 Where the ability to measure a parameter is affected by mixing before emission, then, with agreement from the Agency, the parameter may be assessed before mixing takes place.</p>	<p>This is not considered applicable at the Hollywood facility.</p>
<p>6.3 Test Programme 6.3.1 The licensee shall prepare, to the satisfaction of the Agency, a test programme for abatement equipment installed to abate emissions to atmosphere. This programme shall be submitted to the Agency in advance of implementation. 6.3.2 This programme, following agreement with the Agency, shall be completed within three months of the commencement of operation of the abatement equipment. 6.3.3 The criteria for the operation of the abatement equipment as determined by the test programme, shall be incorporated into the standard operating procedures. 6.3.4 The test programme shall as a minimum: (i) Establish all criteria for operation, control and management of the abatement equipment to ensure compliance with the emission limit values specified in this licence. (ii) Assess the performance of any monitors on the abatement system and establish a maintenance and calibration programme for each monitor. A report on the test programme shall be submitted to the Agency within one month of completion.</p>	<p>There are no direct emissions to air associated with the facility, therefore no abatement systems are proposed, ref Schedules of W0129-02:</p> <p>C.1.1 Control of Emissions to Air There shall be no emissions to air of environmental significance.</p> <p>C.1.2 Monitoring of Emissions to Air There shall be no emissions to air of environmental significance.</p>

W0129-02 Condition	Murphy Environmental Objection
<p>6.4 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. Agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.</p>	<p>No continuous monitoring/samplers are proposed.</p>
<p>6.11 Storm Water A visual examination of the storm water discharge shall be carried out daily. A log of such inspections shall be maintained.</p>	<p>This check is conducted weekly and this monitoring frequency is proposed to continue.</p>
<p>7.3 The licensee shall identify opportunities for reduction in the quantity of water used on site including recycling and reuse initiatives, wherever possible. Reductions in water usage shall be incorporated into Schedule of Environmental Objectives and Targets.</p>	<p>M.E. has undertaken water conservation measures (e.g. rainwater harvesting) - there will be limited potential for ongoing reductions in usage going forward.</p>
<p>7.4 The licensee shall undertake an assessment of the efficiency of use of raw materials in all processes, having particular regard to the reduction in waste generated. The assessment should take account of best international practice for this type of activity. Where improvements are identified, these shall be incorporated into the Schedule of Environmental Objectives and Targets.</p>	<p>M.E. reports on the volume of waste produced and recycled in the Annual Environmental Report. Waste separation techniques are employed and appropriate facilities are used for recovery and/or disposal of waste generated. In addition paper used at the facility is recycled paper. Waste volumes are considered minimal for the operation of the site and there are limited opportunities for ongoing reductions in the amount of waste generated.</p>
<p>12.2.3 As part of the measures identified in Condition 12.2.1, the licensee shall, to the satisfaction of the Agency, make financial provision to cover any liabilities identified in Condition 12.2.2. The amount of indemnity held shall be reviewed and revised as necessary, but at least annually. Proof of renewal or revision of such financial indemnity shall be included in the annual 'statement of measures' report identified in Condition 12.2.1.</p>	<p>M.E. requests that confidential financial information be excluded from public reporting requirements.</p>

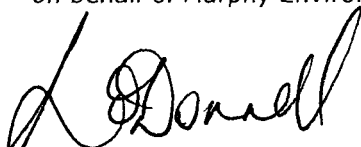
W0129-02 Condition	Murphy Environmental Objection
<p>Table A.2.1 Waste for Disposal</p>	<p>M.E. proposes the addition of the following EWC codes:</p> <ul style="list-style-type: none"> • 010409 Sand • 100101 Casting Cores or Moulds • 100101 Bottom Ash & Boiler Ash • 101006 Casting Cores or Moulds • 170501 Clay • 190899 Waste From Waste Water Treatment plants not otherwise specified • 190902 Sludges from water clarification • 190904 Waste from the preparation of water intended for human consumption <p>M.E. currently has an agreement from the Agency to accept "other" waste types which are proven to be inert, therefore M.E. proposes the inclusion of the following footnote to the table: <i>"other waste which is deemed by the licensee as acceptable and which is proven to meet Level 1 testing and all other waste acceptance criteria"</i></p>
<p>Table A.4.1: Limit Values for Pollutant Content for Inert Waste Landfills.</p>	<p>In light of ongoing consultation with the EPA OEE Inspector in terms of Waste Acceptance Criteria, M.E. proposes the following provision be made in the licence, to be 'activated' following an EPA decision in this regard:</p> <p><i>In certain circumstances, up to three times higher limit values for specific parameters listed in this section (other than dissolved organic carbon (DOC) in sections 2.1.2.1, 2.2.2, 2.3.1 and 2.4.1, BTEX, PCBs and mineral oil in section 2.1.2.2, total organic carbon (TOC) and pH in section 2.3.2 and loss on ignition (LOI) and/or TOC in section 2.4.2, and restricting the possible increase of the limit value for TOC in section 2.1.2.2 to only two times the limit value)</i></p> <p>[COUNCIL DECISION of 19 December 2002 establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC]</p>
<p>Table C.2.1: Environmental monitoring locations</p>	<p>M.E. also monitors SWD1 to SWD7 as part of the quarterly sampling round, when there is water flow at these locations.</p>

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W0129-02 Condition	Murphy Environmental Objection
<p>SCHEDULE D: Recording and Reporting to the Agency Surface water quality - Six-Monthly Within ten days of obtaining results. Monitoring of groundwater quality - Six-Monthly Within ten days of obtaining results. Monitoring of leachate Six-Monthly Within ten days of obtaining results. Dust monitoring Six-Monthly Within ten days of obtaining results.</p>	<p>M.E. requests the re-evaluation of the 10-day report turnaround requirement, to facilitate collation of the report and QA by M.E.'s consultants and M.E. managers. M.E. would request that the Agency considers the existing (W0129-01) reporting requirement, i.e. '10 days after the end of the quarter being reported on'.</p>
<p>SCHEDULE E: Annual Environmental Report Report on the assessment of the efficiency of use of raw materials in processes and the reduction in waste generated.</p>	<p>This is not considered applicable at the Hollywood facility.</p>

We are available to clarify any of the information outlined in this document, or to provide additional information, if required. Please contact Louise O'Donnell (Patel Tonra Ltd.) on 01 8020523, or Patricia Rooney (Murphy Environmental) directly on 087 2539959 if we can be of assistance.

Yours sincerely
on behalf of Murphy Environmental (a division of Murphy Concrete Manufacturing Ltd.)



Louise O'Donnell
Senior Environmental Consultant
Patel Tonra Ltd.

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