



Environmental Protection Agency
An Ghníomhaireacht um Chaomhú Comhshaoil

Nenagh Town Council
Town Hall
Nenagh
County Tipperary

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18th April 2008

Reg No: W0240-01

Dear Sir/Madam,

I am to advise you that the Agency has received an application for a Waste Licence from Advanced Environmental Solutions (Ireland) Ltd., for a facility located at Advanced Environmental Solutions (Ireland) Limited, Solsborough, Springfort Cross, Nenagh, .

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.

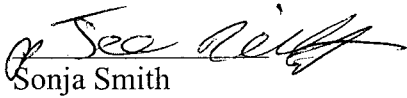
The provisions of Section 52 of the Waste Management Acts, 1996 to 2007, provides that the Agency shall obtain the consent of the sanitary authority to the proposed discharge from an activity which involves the discharge of trade effluent or other matter (other than domestic sewage or storm water), to 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 2007 and Section 99E(3) of the Environmental Protection Agency Acts, 1992 and 2007. 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 5 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. Ewa Babiarczyk is dealing with this matter and can be contacted at the Licensing Unit, Office of Climate, Licensing & Resource Use (Tel. No. 053 9060662), if you have any queries.

Your co-operation in this matter is appreciated.

Yours sincerely,



Sonja Smith

Programme Officer

Licensing Unit

Office of Climate, Licensing & Resource Use



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INTRODUCTION

This response has been prepared on behalf of Advanced Environmental Solutions (Ireland) Ltd in response to correspondence (Dated 11th March 2008) from the Agency requesting further information pertaining to the Waste Licence Application (W0240-01) submitted by Advanced Environmental Solutions.

RESPONSE TO POINT 1

Copies of all Waste Collection Permits for Waste Contractors used by AES at this facility have been included in Appendix A.

RESPONSE TO POINT 2

A more detailed floor plan has been included for the waste transfer building to demonstrate the typical locations for the various activities; inspection, segregation, recycling & transfer, within the waste transfer building. It should be noted that the proposed location of the waste quarantine area has been changed. Drawing DG0008 (Site Operations Plan) has been amended to reflect these updated details. This drawing has been included in Appendix B.

RESPONSE TO POINT 3

Confirmation from North Tipperary County Council, Planning Department has been acquired, stating that an EIS was not required at the planning stage for this facility. A copy of this correspondence is included in Appendix C.

RESPONSE TO POINT 4

An absorbent floor dressing material is used in the garage building to soak up any spillages. The product used is a naturally occurring substance presenting no known ecological hazards. The absorbent is disposed of appropriately following use. A safety data sheet for the product has been included in Appendix D.

RESPONSE TO POINT 5

In the original Waste Licence Application there was no discharge to any local authority sewers; sanitary effluent from site offices and run-off from the waste transfer building were discharged to storage tanks on site (see DG DG0005 A01) prior to tankering off site.

Since this waste licence application was lodged with the EPA, AES have secured the agreement of Nenagh Town Council to facilitate connection to the local authority foul sewer. The on-site drainage will be altered to connect to the local authority foul sewer and the two on-site storage tanks will be decommissioned. Further details are provided in Response to Point 8. An agreement from the local authority with conditions has been included in Appendix E. This alternative means of dealing with the foul effluent generated on site will affect the following sections of the original Waste Licence Application.

Section B.4 of the Waste Licence Application should be amended as follows:

Name: Nenagh Town Council
Address: Civic Offices, Limerick Rd, Nenagh, Co. Tipperary.
Tel: 067 – 31241
Fax: 067 – 34841

Section D.1.k Sewerage and surface water drainage infrastructure should be amended as follows:

Sanitary effluent from the workshop building and the office building will be directed, through a new connection, to nearby the local authority foul sewer.

The storm water system on site consists of a network of gullies, grills and pipes as shown on DG0005. The surface water collected from the hardstanding area to the west of the main waste building flows to the oil interceptor adjacent the weighbridge before flowing to a second oil interceptor in the northeast corner of the site before finally discharging to an open drain. Surface water collected from the hardstanding area to the east of the main waste building flows directly to the second oil interceptor before discharge through a 170mm concrete pipe to the open drain.

Section E.3 Emissions to Sewer should be amended as follows:

Any run off from the waste tipped on ground slab within the main building flows to gully will be directed to the local authority foul sewer. Details of the layout are included in DG0005 A02.

Sanitary effluent from toilets located in the garage building and the site offices is directed to the local authority foul sewer. Details of the layout are included in DG0005 A02.

Emission points within the facility are shown on DG0006 in Appendix E.

Table E.3 (i) & E.3 (ii) have been amended to reflect the changes described above and have been included in Appendix E.

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

Monitoring of the discharge to the local authority sewer will be agreed in consultation with Nenagh Town Council. Monitoring can be conducted at the proposed manhole opposite Entrance No. 2.

Section I.3. Assessment of Impact of Sewage Discharge should be amended as follows.

Attachment I.3. Assessment of Impact of Sewage Discharge.

The expected flows of effluent from the site are not significant and agreement has been reached from Nenagh Town Council to facilitate this arrangement. There will be no significant impact of sewerage discharge from the facility.

RESPONSE TO POINT 6

The Agency requested information for consideration pertaining to Section 84(4) of the PoE Act. A letter from senior management at AES has been included in Appendix F.

RESPONSE TO POINT 7

A new drawing (DG0009) has been included showing the location of monitoring points and emission points. Emission points A2-1, A2-2, N1 & N2 relate to the various activities that take place within the waste transfer building. As there is no fixed plant within the building and different activities are undertaken in different parts of the building; there are no point source emissions; the approximate location for these emissions has been placed at the entrance to the building. A drawing showing emissions & monitoring points (DG0009) has been included in Appendix G.

RESPONSE TO POINT 8

Nenagh Town Council have accepted AES's application for a connection into the local authority foul sewer at Springfort & Limerick Road. Works are currently underway to complete the connection to facilitate the discharge of sanitary effluent from the site offices and any leachate run-off from the waste transfer building to the local authority sewer. An updated drainage drawing DG0005 & a letter of confirmation from Nenagh Town Council has been included in Appendix E.

APPENDIX E

Proposed Drainage – DG0005

Emissions – DG0006

Confirmation Letter from Nenagh Town Council

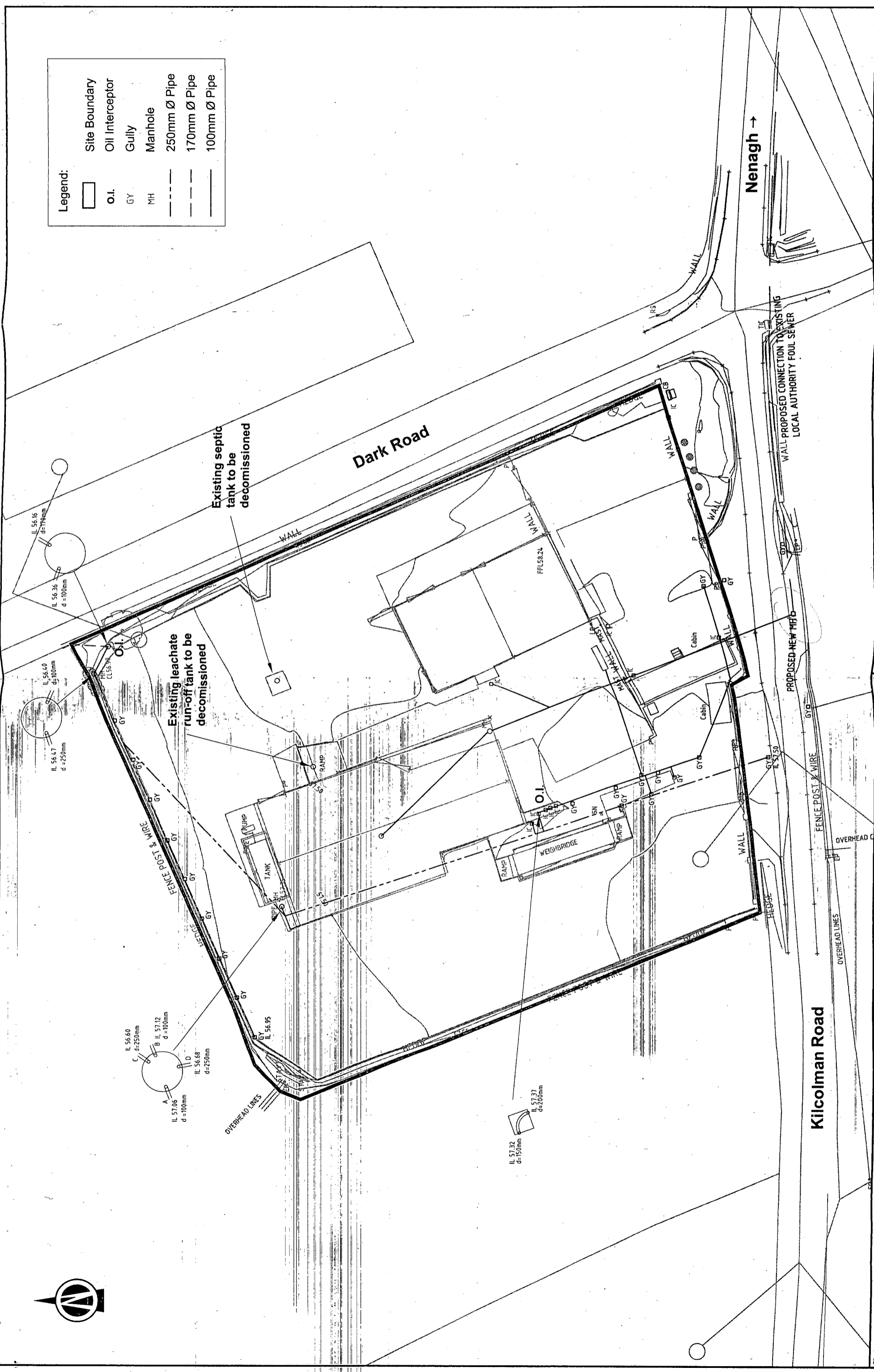
re: Foul Water Connection

Tables E.3.(i) & E.3.(ii)



Legend:

	Site Boundary
	Oil Interceptor
	Gully
	Manhole
	250mm Ø Pipe
	170mm Ø Pipe
	100mm Ø Pipe



Job No:	MDR0515
File No:	MDR051500005A02
Drawn by:	HF
Checked by:	MS
Approved by:	LOT
Scale:	1:500 @ A3
Date:	Apr '08
Rev:	DG0005
Proj:	A02

PROPOSED DRAINAGE

NENAGH WASTE TRANSFER STATION

Project	LOT	Further Information
A02	Apr'08	Issue for Approval
A01	Nov'07	Draft Issue
D01	Nov'07	Amendment/Issue

NOTES

- This drawing is the property of RPS Consulting Engineers. It is a confidential document and must not be copied, used, or its content divulged without prior written consent.
- All Levels refer to Ordnance Survey Datum, Mean Head.
- DO NOT SCALE. Use figured dimensions only, if in doubt ask.

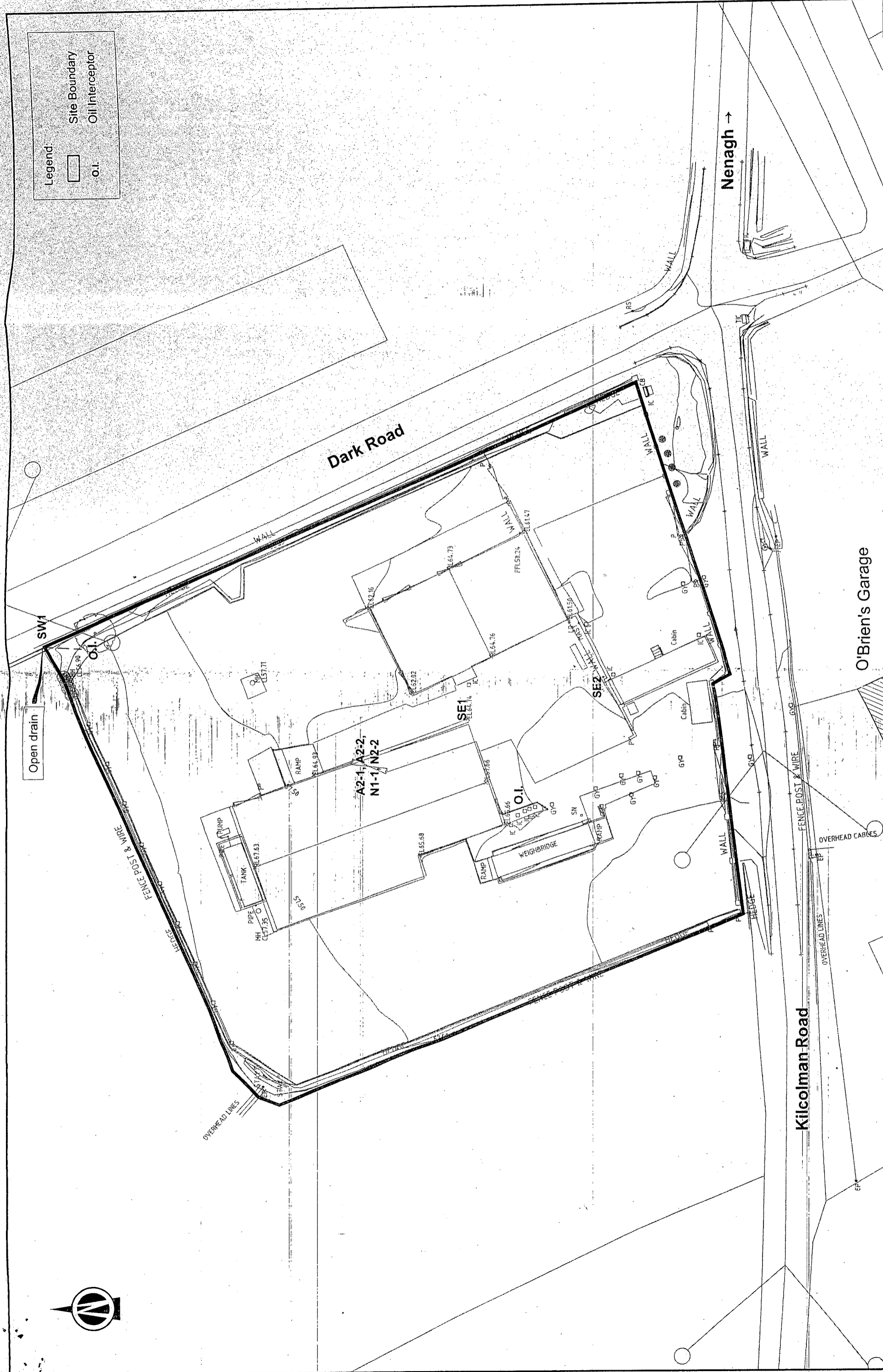
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AES
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 Monread Road
 Naas
 Co. Kildare
 T: 045-843800 F: 045-981621
 Email: info@aesirl.ie



Legend:

- Site Boundary
- Oil Interceptor



Client: Advanced Environmental Solutions (Ireland) Ltd.
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Project: NENAGH WASTE TRANSFER STATION

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Revision Table:

No.	Date	Description / Issue	App.
A02	Apr08	Further Information	LOT
A01	Nov07	Issue for Approval	LOT
D01	Nov07	Draw Issue	LOT
No.		Amendment / Issue	App.

Job No: MDR0515
File No: MDR0515DG0006A02
Drawn by: HF
Checked by: MS
Approved by: LOT
Scale: 1:500 @ A3
Date: Nov '07
Rev: DG0006
Doc No: A02

Title: EMISSIONS

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

Emission Point: SE1

Emission Point Ref. N ^o :	SE1
Location of connection to sewer :	Manhole adjacent to site entrance
Grid Ref. (10 digit, 5E,5N):	(184,937, 178,724)
Name of sewage undertaker:	Noerth Tipperary County Council

Emission Details: Run off from slab within waste building not uniform flow.

(i) Volume to be emitted			
Normal/day	0.25m ³	Maximum/day	0.75m ³
Maximum rate/hour	0.3m 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
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Emission Point: SE2

Emission Point Ref. N°:	SE2
Location of connection to sewer :	As SE1
Grid Ref. (10 digit, 5E,5N):	As SE1
Name of sewage undertaker:	As SE1

Emission Details: Sanitary effluent from facility toilets

(i) Volume to be emitted			
Normal/day	0.48m ³	Maximum/day	0.60m ³
Maximum rate/hour	0.08m 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
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TABLE E.3(ii): EMISSIONS TO SEWER - Characteristics of the emission (1 table per emission point)

Emission point reference number : SE1 & SE2

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	
Not Available									