Treatment, Abatement and Control System Changes

Recent WWTP System Upgrades:

Following the substantial modifications to the wwtp in 2006 and 2007 a marked improvement was noted in the wwtp. A summary of these changes include:

- Installation of storage tanks at front end of plant to provide more consistent hydraulic loading to wwtp feed
- Installation of aeration mixing in front end storage tanks to provide homogeneous fresh feed to wwtp
- Diversion of uncontaminated roof water away from wwtp to reduce impact of wet weather periods (ongoing project)
- Installation of new grease trap for the foul sewer/canteen discharge
- Review and segregation of yard drainage system to optimise discharges to wwtp and eliminate contaminated discharges to the officereptor
- Diversion of wwtp effluent off-site for further treatment until emission limit values can be met consistently

Further changes (proposed or ongoing) to improve groundwater protection:

In order to further improve groundwater protection:

- A new oil/silt interceptor has been installed for emission point FE2. The interceptor is a Klargester NS200 Class 1 full retention separator and is the best available unit on the market with a built in silt trap. The unit has a flow rate capacity of 200litre/second, a capacity of 53,500 litres with an oil intercept capacity of 2000litres and a silt capacity of 20,000 litres. It also has a built in oil alarm tube. This type of separator is designed for use in applications such as fuel distribution depots and vehicle workshops. Separation of the drainage systems and installation of the new oil interceptor will ensure discharges of environmental significance will not occur from this emission point. Full details of the unit are attached in Attachment D.1.
- Develop an environmental laboratory and recruit an environmental analyst in 2008. The
 primary benefit will be to provide more frequent and improved measurement data to
 identify trends and changes in wwtp in order to optimise control in the current wwtp and
 ultimately ensure consistent effluent discharges.
- If, following optimisation of the current wwtp system, tertiary treatment of the effluent is required, Mr Binman will install the most appropriate technology to ensure compliance.
 Please find attached a suitability assessment report for installation of reed bed technology for treatment of discharges from the facility. Further assessment of this

option will be made pending the outcome of the data provided for the primary and secondary treatment systems already in place.

- Complete diversion of uncontaminated roof water
- Seal all joints on hard-standing areas

These projects combined with the projects already completed in the previous two years will ensure optimum operation of the drainage system and the wwtp at the facility.

All waste water discharges from the facility will be sent off-site for further treatment until the efficient operation of the wwtp can be demonstrated and the emission limit values can be achieved on a consistent basis.



Mr. Binman Ltd

Proposed constructed wetland for polishing surface water runoff.

DRAFT

Luddenmore, Grange, Kilmallock, Co. Limerick.

June 2008.

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VESI Environmental Ltd.

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1. Introduction

A constructed wetland is being proposed at the Mr. Binman site, Luddenmore, Grange, Kilmallock, Co. Limerick for polishing surface water run-off from the recycling facility. A site has been located to the east of the facility for the development of a constructed wetland. Information obtained from Mr. Binman Ltd and site assessments have been used in assessing the suitability of the site and in providing data necessary for the design of the proposed wetland system.

Constructed wetlands are effective in treating different types of contaminated runoff through various physical, chemical and biological processes involving plants, algae, micro-organisms, water, soil, wind and sun. The constructed wetland design endeavours to optimize the natural biological, chemical and physical processes of pollutant removal in a way that is compatible with the local aquatic and terrestrial communities and that does not incur negative impact on adjacent aquatic and terrestrial ecosystems.

2. Site assessment

The location, topography, geology and soils and subsoils, surface water and groundwater hydrology, ecology, social and planning aspects, archaeological and architectural features and natural interest need to be considered when assessing the suitability of a site for a constructed wetland.

A preliminary site assessment was undertaken in March 2008 to assess the proposed development site. As part of the assessment ground conditions were examined by excavating trial holes to a depth of 3m to determine the nature, thickness and permeability of the underlying soil and subsoil. Soil samples were taken for analysis. The results of the soil sample from trial pit 01 indicate soils that are 'brown slightly gravelly CLAY', with a clay content of 13% and a total fines content of 30%. Results from trial pit 02 indicate 'brown clayey very sandy GRAVEL', with a clay content of 9% and a total fines content of 18% (see appendix 1). Further trial holes will need to be excavated to determine the height of the water table.

A site suitability assessment undertaken by hydrogeologist Jerome Keohane (GES Ltd) in December 2006 directly adjacent to the proposed development site concluded from he's findings that the site was suitable for the development of a constructed wetland to polish surface water run-off, provided that a minimum of 1.5 m of low permeable material is provided above the bedrock. The material excavated from trial pit 01 would be suitable material to form the wetland soil liner. This type of material would need to be provided throughout the site to the minimum depth requirement.

The proposed wetland site is steeply sloping, therefore there will be greater depth of excavation required and a need for larger land uptake.

The wetland is being designed for the treatment of 26m³/day of effluent derived from surface water runoff from the preceding yards, which is currently being treated through the existing Wastewater Treatment Plant (WWTP). The quality of the effluent discharging from the WWTP has a BOD concentration of 20 mg/l and a suspended solids concentration of 30 mg/l. Following treatment through the WWTP the effluent would be pumped to the constructed wetland for further treatment through a series of ponds, before discharging to ground.

3. Proposed constructed wetland size and layout

A series of constructed ponds covering a surface water area of approximately 1500m² is being proposed, with a total wetland area of 2200m². The wetland would need to be constructed using suitable soil material, ideally sourced in-situ. The soil used will be for the creation of the embankments and the wetland (soil) liner to ensure stability and sufficient low permeability (<1x10⁻⁸m/s) for groundwater protection. A tickness of 1.5m of low permeability material must be provided over the underlying bedrock.

The proposed wetland is located adjacent to lands sloping toward the system (preceding yards and new entrance road (proposed)), therefore a drain or an embankment would be constructed around the ponds to prevent/givert potentially large volumes of runoff entering the system that should be treated/discharged separately.

The embankments created for each pond should ideally be gently sloping, however due to the steepness of the site embankments for the Mr. Binman wetland may need to be more steeply sloping (1:1 or 1:2) to maximise wetland area. The embankment height should be at least 1 m to ensure containment of water and allow for accumulation of sediments. The crest/top of the embankment should be 2-3 m wide at the top to provide for structural stability and allow access to the wetland.

Each wetland pond is connected with 150 mm diameter ducting, placed within the embankment at the outlet/inlet point of each pond. Pipes are positioned in places that are accessible and as close as possible to the pond base of the exit point to ensure that complete drainage is possible if required in the future. Piping is placed so as to ensure that the movement of water in each segment is across the maximum distance from inflowing point to exit.

All ponds are planted with a variety of suitable native & ideally locally sourced plants. Planting is recommended using bare root species and at a density of 2 plants per meter squared to

provide reasonable cover within one full growing season. Typical plant species used include common sedge, bulrush, water grass, iris and reedmace.

The water depth within each treatment pond will be between 150mm-200mm, with a maximum depth of 300mm. A wetland area of 1500m² would have holding capacity of at least 450m³, providing a nominal residence time of 17 days.

Discharge

The final effluent from the wetland will discharge to ground adjacent to the wetland site. The c. 1500m² wetland is expected to reduce BOD and suspended soilds to a concentration of < 10 mg/l and <10 mg/l respectively. It is recommended that a monitoring chamber is installed at the outlet point of the final pond before discharging to ground to allow for the sampling of the final effluent water quality and flow rates.

4. Operation and maintenance of a constructed wetland.

An operation and maintenance programme will need to be implemented once the wetland has been constructed to assist on-site personnel for the daily and weekly management of the ICW.

The operation and maintenance programme would include details on some of the following procedures:

- 1. Flow monitoring to and from the wetland.
- 2. Surface water quality monitoring of the final effluent
- 3. Vegetation monitoring vigour and growth
- Maintenance of access fencing
- 5. Maintenance of embankments
- 6. Maintenance of inlet and outlet pipes
- 7. Water level management
- 8. Maintenance of flow
- 9. Visual monitoring of final effluent colour, odour, foaming, sediments.
- 10. Sediment/sludge management

5. Conclusion

The site at Luddenmore is suitable for a constructed wetland site, provided that the minimum soil depths can be provided throughout the site. While the proposed wetland area should provide reasonable treatment of BOD and suspended solids, reduction in phosphates, nitrates, ammonia etc have not been assessed as their influent rates are unknown at this stage.

1

Further information is required on the water table height and on whether suitable local material can be sourced to develop the wetland if sufficient quantities of soil are not found on site.

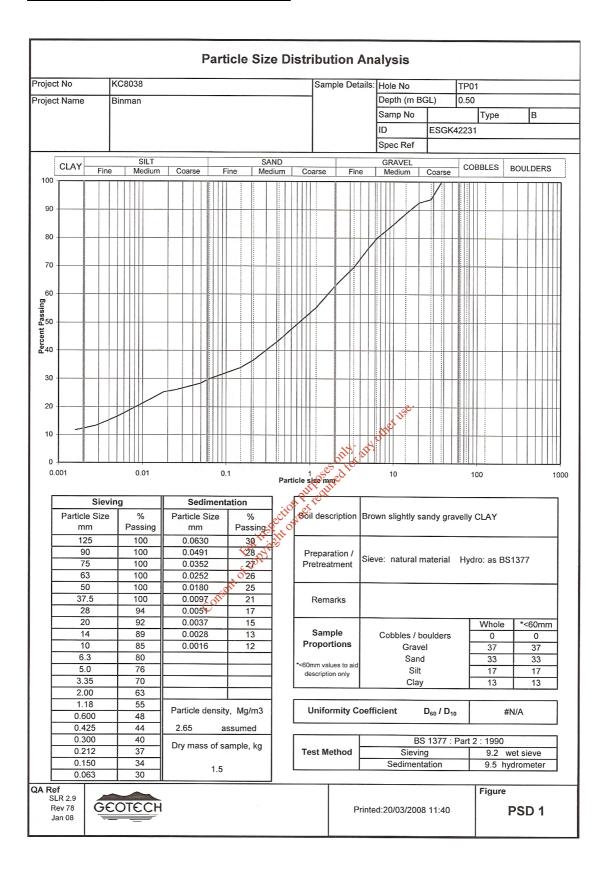
A preliminary wetland layout is presently being prepared and will be available shortly, detailing pond layout, flows and access.

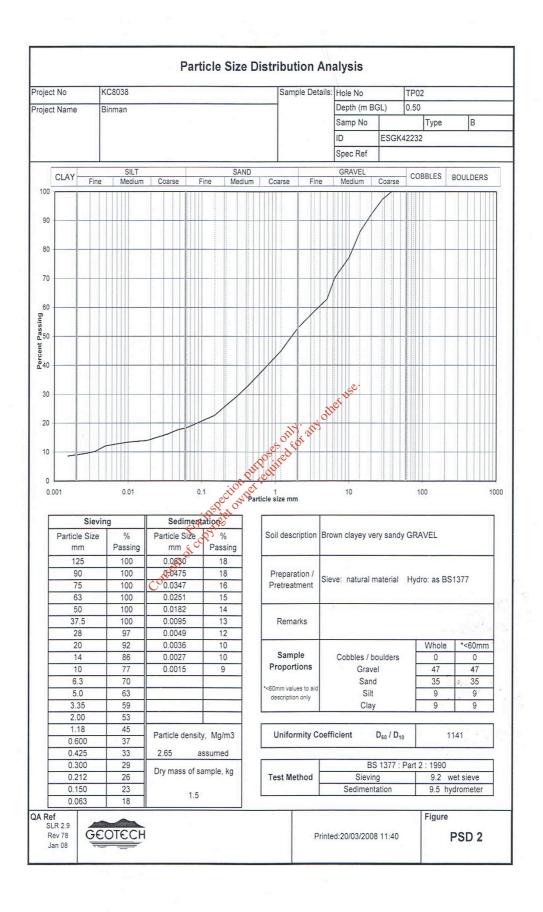
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APPENDIX 1

Soil analysis Trial Pit 01 & 02

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Air Monitoring Point Changes

Dust Monitoring

The operation is currently monitored at monthly intervals for dust. There are currently three monitoring points located on site.

It is proposed to relocate dust monitoring point C to an alternative location on the new site boundary to the east site of the site to ensure there is no impact off-site. Please find attached an assessment by our Consultants regarding the current position of this monitoring point. A drawing is attached with the proposed location of the new dust monitoring point.

No other changes are proposed for Air monitoring points and the proposed for Air monitoring points and the proposed for Air monitoring points are proposed for Air monitoring points and the proposed for Air monitoring points are proposed for Air monitoring points and the proposed for Air monitoring points are proposed for Air mon

Analysing Testing Consulting Calibrating



Mairead Wilkinson Mr. Binman Luddenmore Grange Kilmallock Co. Limerick

1st July 2004

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Dear Mairead,

Further to my recent site visit to view dust deposition monitoring locations I would like to make the following observation in relation to the location of dust monitoring gauge C. According to the German Standard VDI 2119 Part 2

'care shall be taken that the site is not affected by emissions from immediately adjacent sources for example, trees, building sites) which could limit the representative nature of the measurements required by the measurement task'

Location C is unsuitable as it is directly adjacent to a waste management process (the stock piling of wood chippings and saw dust) as can be seen in photograph 1. Dust deposition at this location is not representative of dust deposition due to overall site activity. Deposition measurements will more than likely lead to erroneously high values due to large dust particles depositing very close to their source.

It is my recommendation that dust deposition gauges be relocated to a position further removed from the wood chippings pile as indicated in photograph 2

If you wish to discuss this or any other matter further please do not hesitate to contact me.

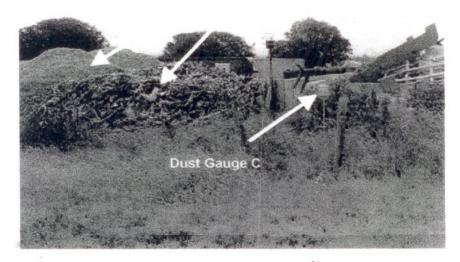
Yours sincerely,

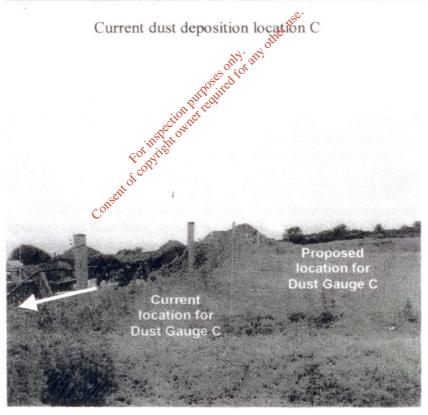
Paul O'Sullivan

Technical Manager, CEM Department

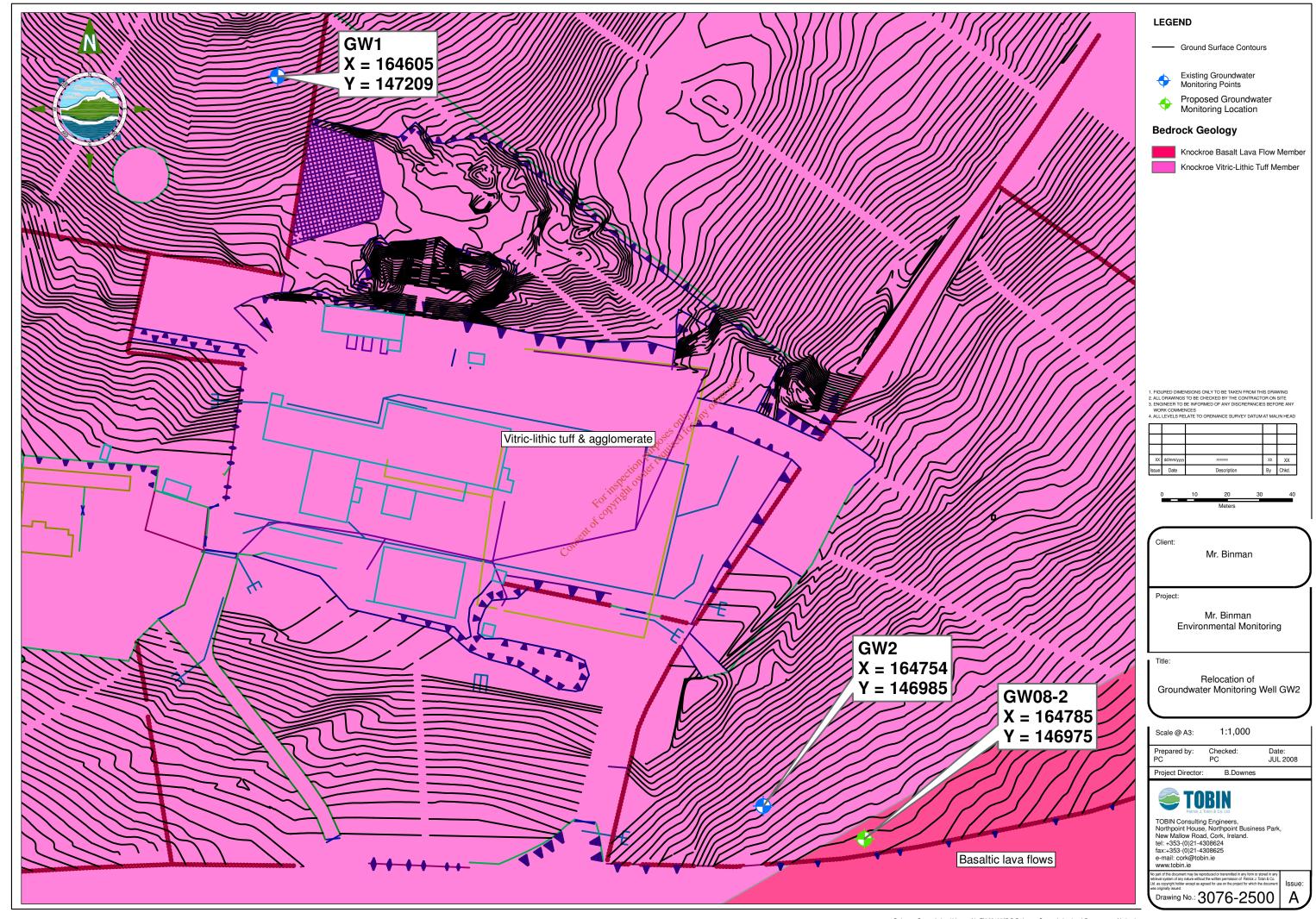
BHP Laboratories

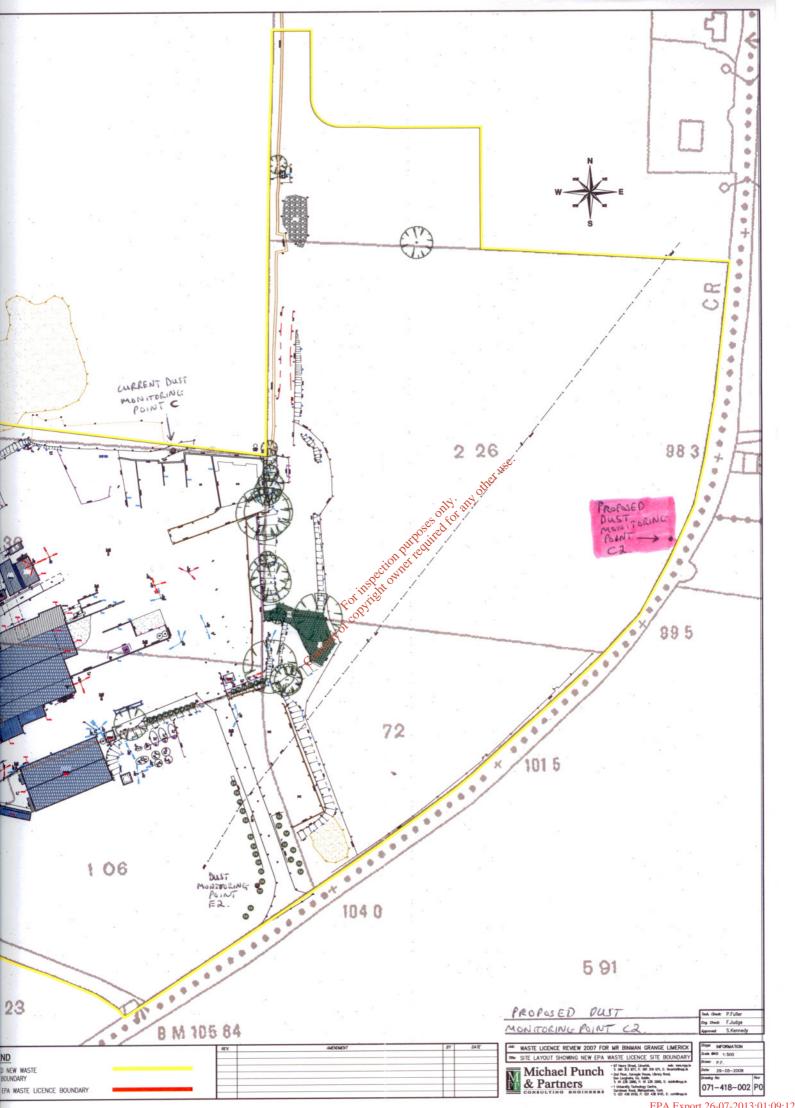
Saw dust and wood chippings

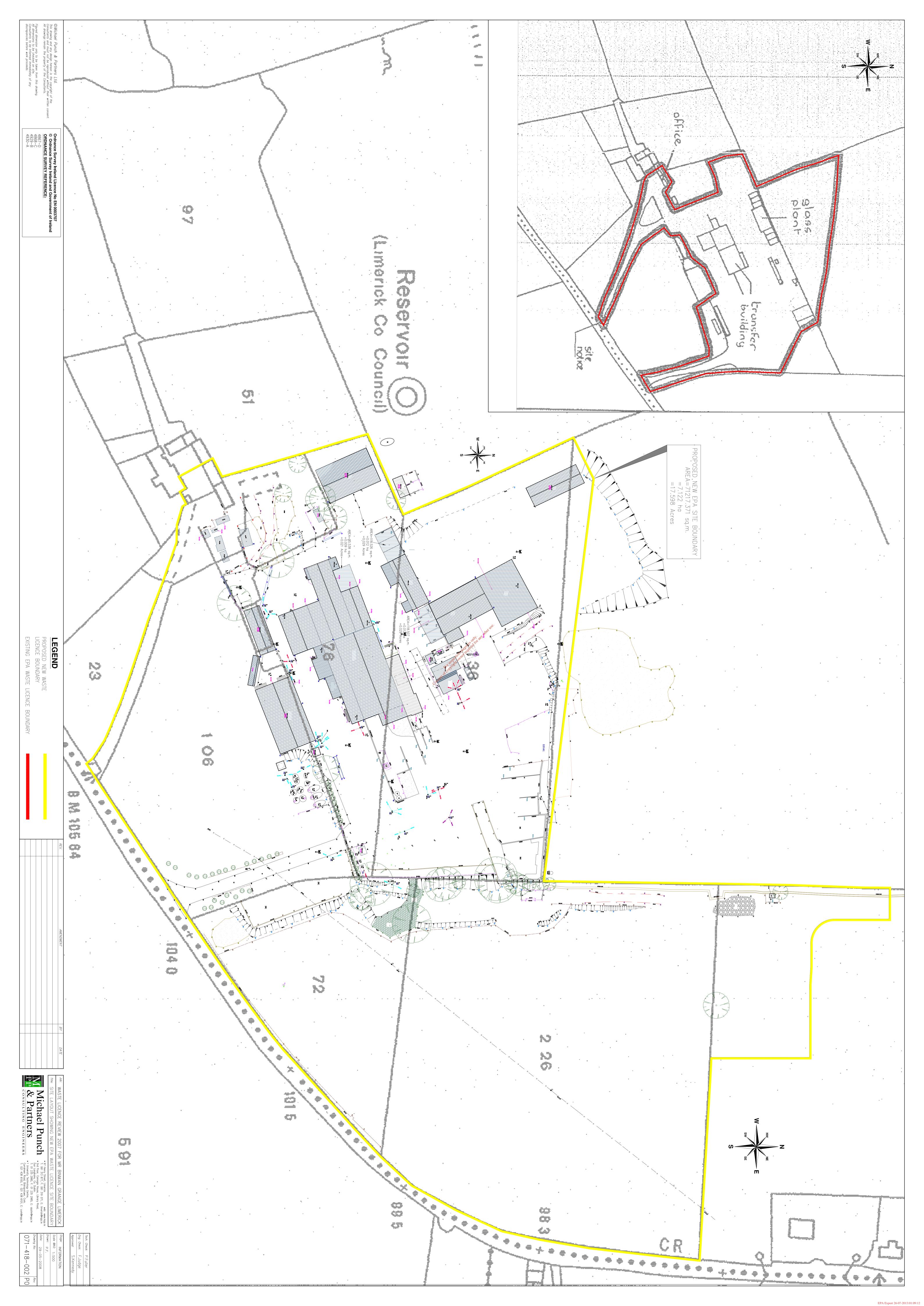




Proposed location for dust gauge C away from wood chippings pile







Groundwater Well Monitoring Point Change

There are two existing groundwater monitoring wells associated with the facility, GW1 (upstream) and GW2 (downstream). Ongoing monitoring of these wells has clearly demonstrated that there has been no impact on the groundwater quality from the facility.

Due to construction of the new road for access/egress to/from the facility it will be necessary to relocate the downstream monitoring well to a point adjacent to the existing well location. Following consultation with the Consultants that conduct the groundwater monitoring, the most appropriate relocation point for the well was recommended and is marked in the attached drawing. The new monitoring point will be called GW08-2.

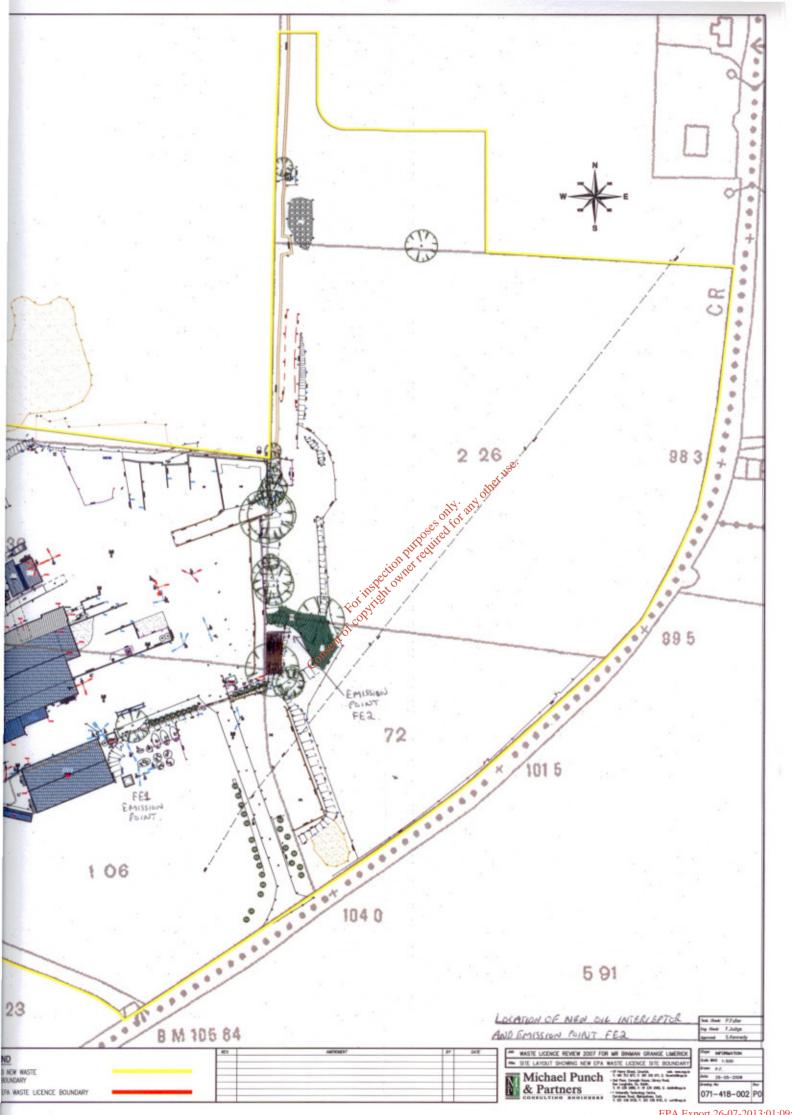
Oil Interceptor Discharge Monitoring Point

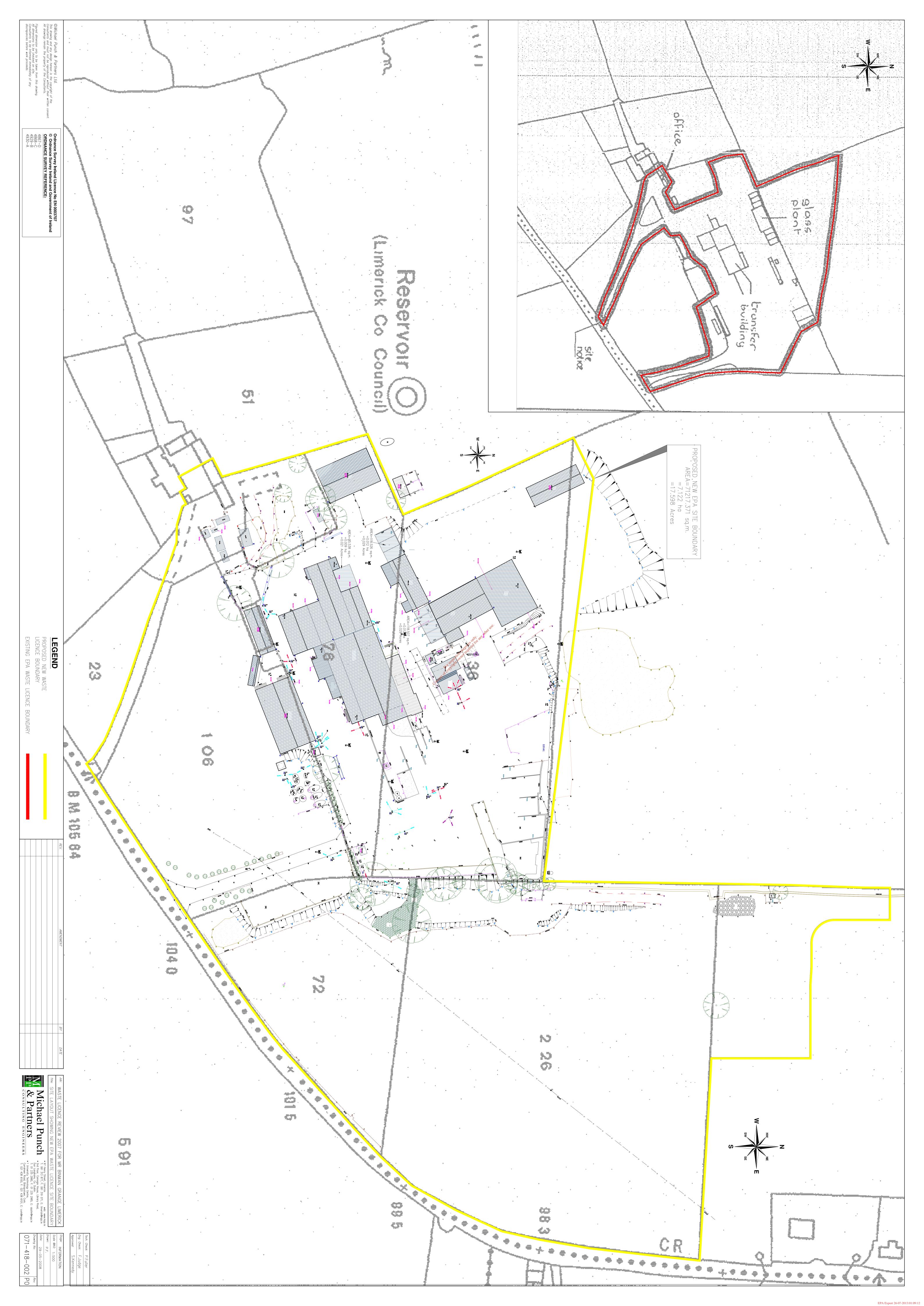
For emission point FE2, the discharge from the oil interceptor, it is proposed to replace the existing oil interceptor with an NS200 Klargester Class oil Interceptor. Please find attached a drawing detailing the proposed location of the oil interceptor and the emission point FE2.

TABLE E.4(i): EMISSIONS TO GROUNDWATER (1 Page for each emission point)

 $\label{point:eq:mission} \textbf{Emission Point or Area:} \ \textbf{Stormwater Discharge from Oil Interceptor}$

Emission Point/Area Ref. Nº:	FE2
Emission Pathway: (borehole, well, percolation area, soakaway, landspreading, etc.)	Soakaway (proposed) adjacent to soakaway for current oil interceptor
Location:	South East corner of existing site boundary (See drawing)
Grid Ref. (10 digit, 5E,5N):	(164635E, 147221N)
Elevation of discharge: (relative to Ordnance Datum)	113.6m
Aquifer classification for receiving groundwater body:	Refer to original EIS Report, Section 5
Groundwater vulnerability assessment (including vulnerability rating):	Refer to original EIS Report, Section 5
Identity and proximity of groundwater sources at risk (wells, springs, etc):	Refer to original EIS Report, Section 5
Identity and proximity of surface water bodies at risk:	To the fer to original EIS Report, Section 5
	Cour





Noise

a) See attached drawing for the current noise sensitive location monitoring points. There are no proposed changes to the existing noise monitoring conditions.



