



**This Report has been cleared
 for submission to the Board by
 the Programme Manager P. Nolan.**
 Signed: N. Keavey Date: 10/7/08

**OF
 LICENSING & RESOURCE
 USE**

INSPECTORS REPORT ON A LICENCE APPLICATION	
To:	DIRECTORS
From:	STUART HUSKISSON - ENVIRONMENTAL LICENSING PROGRAMME
Date:	10 TH JULY 2008
RE:	APPLICATION FOR A WASTE LICENCE FROM ORMONDE ORGANICS LIMITED, UNIT 643 GREENOGUE INDUSTRIAL ESTATE, RATHCOOLE, COUNTY DUBLIN, LICENCE REGISTER W0237-01

	Application Details
Type of facility:	Hazardous Waste Recovery Facility
Classes of Activity (P = principal activity)	3 rd Schedule: Classes 7, 11, 12 & 13 4 th Schedule: Classes 2, 3, 4, 8 (P) & 13
Quantity of waste managed per annum:	37,000 tonnes
Classes of Waste:	Hazardous Waste and Industrial Waste
Location of facility:	Unit 643 Greenogue Industrial Estate Rathcoole, County Dublin.
Licence application received:	30 th July 2007
Third Party submissions:	None
EIS Required:	Yes
Section 52 Notice sent & response received:	02 nd October 2007 & 3 rd December 2007 respectively
Article 14 Notices sent:	01 st October 2007, 25 th February 2008
Article 14 compliance date:	01 st May 2008
Site and Site Notice Inspection:	19 th September 2007

1. Facility

Ormonde Organics Limited (Ormonde) has applied to operate a new hazardous waste recovery facility in Rathcoole, County Dublin. The 0.41 hectare site is located in the Greenogue Industrial Estate and is situated c. 2km north of Rathcoole and 2km east of Newcastle village. The site is located on the eastern boundary of the industrial estate with other industrial units to the north, west and south. The area to the west of the site is agricultural land. There are 11 houses located within 1km of the site, the nearest is situated c.0.5km southwest of the site boundary.

The facility will accept and process, up to 37,000 tonnes of waste (mainly hazardous) per annum of, two waste streams: (1) hydrocarbon contaminated waste liquids (including interceptor waste, waste oil, coolants, cutting fluids, fuel oils, drain cleaning waste, tank bottoms and bilge waste); and (2) oil-contaminated solid wastes (including spent oil filters and oily rags). The facility will

store up to 100 tonnes of contaminated soils at the facility at any one time, pending transfer to a licensed treatment or disposal facility. The applicant states, in the Environmental Impact Assessment (EIS) for the development, which accompanied the waste licence application, that the quantity of contaminated soil accepted at the facility will not exceed a total of 1,000 tonnes per annum. No processing of contaminated soil will take place at the facility (**Condition 3**).

Since the submission of the waste licence application Ormonde has been granted planning permission by South Dublin County Council (SD07A/0528- 29th August 2007), for the hazardous waste recovery facility on the site. This planning permission amends the previous permission (SD06A/0035), for warehouse building with yard.

The site is partially developed with a yard area and warehouse building that has to date been unused. The proposed facility will consist of three buildings: (i) a waste processing building (Industrial Process Building) including a waste oil process line, an oil mixes process line and utilities; (ii) a waste acceptance and storage building (Industrial Storage Building); and (iii) an intermediate bulk container (IBC) storage building. The facility will also include ancillary storage tanks, a weighbridge, surface water network and trade effluent network. The Industrial Process Building will contain an office area, which will include a laboratory, small kitchen, changing room and control room.

On-site storage will include four c.100m³ bunded storage tanks (1x waste oils balance tank, 1x oil mixes balance tank, 1x emergency buffer tank and 1x reclaimed oil tank). The licence application also included provision for one additional 100m³ waste reception tank and two additional c. 100m³ storage tanks.

The applicant will operate the facility from 08.00 to 18.00 Monday to Friday and 08.00 to 14.00 Saturday, unless with the prior agreement of the Agency. The RD allows for waste acceptance between the hours of 08.00 to 17.30 Monday to Friday and 08.00 to 13.30 Saturday, with the exception of emergencies or as may be agreed by the Agency. This is to allow 30 minutes before closing time for clean up work, etc. The facility will employ 4 - 6 people.

Initially this waste licence application also included a proposal to accept and treat acid/alkaline waste streams at the facility. Ormonde withdrew this proposal from the application during the licensing process.

2. Operational Description

Table 1: Proposed waste types and quantities:

Waste Type ^{Note 1}		Maximum (Tonnes Per Annum)
Non-Hazardous Wastes ^{Note 2}	Coolant/Emulsions 16 01 15 antifreeze fluids other than those mentioned in 16 01 14	5,500
Non-Hazardous Waste Total		5,500
Hazardous Wastes	Oil Wastes, Wastes of Liquid Fuels & Waste Containing Oil EWC Codes: All Chapter 13 codes and 05 01 05*, 05 01 06*, 05 02 02*, 16 07 08* Includes waste hydraulic oils, waste engine, gear and lubricating oils, waste insulating and heat transmission oils, bilge oils, oil/water separator contents, wastes of liquid fuels and oil wastes not otherwise specified.	27,500 ^{Note 3}
	Coolant/Emulsions 16 01 14* antifreeze fluids containing dangerous substances	
	Oil Filters 16 01 07* oil filters from end of life vehicles	3,000 ^{Note 3}

Contaminated Soils ^{Note 4}	1,000 ^{Note 5}
17.05.03* soil and stones containing dangerous substances	
17.05.05* dredging spoil containing dangerous substances	
17.05.07* track ballast containing dangerous substances	
19.13.01* solid wastes from soil remediation containing dangerous substances.	
19.13.03* sludges from soil remediation containing dangerous substances.	
19.13.05* sludges from groundwater remediation containing dangerous substances.	
Hazardous Waste Total	31,500
TOTAL	37,000

- Note 1: Only wastes specified, or with "European Waste Catalogue and Hazardous Waste List" codes listed, in this table are to be accepted at the facility, unless otherwise agreed in advance by the Agency.
- Note 2: Any proposals to accept other compatible non-hazardous waste types must be agreed in advance by the Agency.
- Note 3: The limitation on *oil wastes and wastes of liquid fuels and waste containing oil* and *oil filters* may be varied with the agreement of the Agency subject to the total limit for hazardous waste staying the same.
- Note 4: No processing of contaminated soils shall take place at the facility.
- Note 5: The maximum quantity of contaminated soils held at the facility shall not exceed 100 tonnes at any one time.
- Note 6: No processing of wastes with EWC Codes 13 01 01, 13 03 01 and 16 01 14 shall take place at the facility. The licensee is limited to the acceptance and temporary storage only of these wastes.

The infrastructure capacity as detailed in the licence application is considered appropriate for the proposed waste quantities to be accepted. The Recommended Determination (RD) includes provision for the tonnages of the individual hazardous waste types to be changed with the agreement of the Agency, subject to the total limit for hazardous waste and the overall total remaining the same.

The treatment processes carried out at the facility will have a limited effect on the removal of dangerous substances from the incoming wastes. Therefore, **Condition 6** of the RD requires the applicant to segregate and store waste oils, containing PCBs, and anti-freeze, containing dangerous substances, in a dedicated bunded area, prior to being sent off-site for recovery or disposal at an appropriate facility. **Condition 6** of the RD requires the applicant to implement a documented procedure to prevent these wastes being mixed with other waste.

The RD requires all waste off-loading and waste processing to be carried out indoors (**Condition 8.1**).

Condition 6 of the RD requires that oil waste, wastes of liquid fuel and/or waste containing oil, processed at the facility, which fails to meet a product specification or standard as agreed by the Agency, shall be reprocessed on-site or sent off-site for recovery or disposal at an appropriate facility.

With regard to reducing the climate impact of the installation under IPPC, the RD requires an energy efficiency audit and an assessment of resource use efficiency. The EMP objectives and targets include use of cleaner production (including production related carbon footprint).

2.1 Operational Processes

Wastes will be delivered directly from vehicles and containers to one of two fully enclosed segregated intake sumps for (i) Waste Oils or (ii) Oil Mixes. IBCs of accepted waste are to be stored in designated areas at the facility, prior to treatment.

Waste Oils Processing

'Waste Oils', will initially be passed via a fine screen to a de-emulsifier tank with temperature controlled steam heating. A dual fuel (gas/light fuel oil) boiler will supply the required steam. The waste oil temperature will be increased to 80-90°C resulting in emulsion break down and separation. The liquid will then pass to a two-phase decanter solids separator system followed by a polishing mechanical clarifier unit to maximise water/oil separation. Both separators will include in-line polymer addition. Separated solids from the decanter will be conveyed to a cake skip and separated oil from the clarifier will be transferred to the oil mixes balancing tank for processing. The separated oil will be pumped to a reclaimed oil holding tank for periodic tanker removal and further processing at an appropriate facility. Separated wastewater is pumped to the 'Oil Mixes' treatment process, described below.

Oil Mixes Processing

Oil/water mixes, known as 'Oil Mixes', are pumped into a balance tank. The pump sump is fitted with a grit/silt removal facility, which will periodically be emptied for off-site disposal.

The oil mixes undergo three primary treatment processes: (i) polymer addition; (ii) flocculation; and (iii) Dissolved Air Flootation (DAF). These processes are carried out to remove organics, solids and oils fats and greases to below the emission limit values (ELVs) specified within the RD. The effluent from the DAF unit will discharge via a sampling chamber to the Water Services Authority sewer. A valve connection facilitates the transfer of unacceptable effluent to the emergency buffer tank for further processing. The separated oil will be pumped to a 'reclaimed oil' holding tank for periodic tanker removal and further processing at an appropriate facility.

A filter crush assembly with heating and oil removal facilities will separately extract oil from engine filters. This oil will pass into the 'Waste Oils' intake sump to be transferred forward for processing. Crushed filters shall be retained in a skip for removal off site and disposal at an authorised facility. Oily rags will be accepted at the facility, in fully enclosed containers. The oily rags will be cleaned in a water based washing system with the aid of a mild caustic and surfactant detergent. The rags will be dried prior to being sent off site for disposal. The resultant wash water will be passed through a DAF unit, which will remove the hydrocarbon content prior to discharge of the remaining water to trade effluent sewer.

Emissions to air will arise from the building extraction and the on-site boiler. Emissions to sewer will arise from the wash-bay, water removed from treated oils and other process wastewaters. All wastewaters will be discharged to South Dublin County Council trade effluent sewer, via a Class II oil separator. Noise at the facility will arise from site related traffic, the wash-bay, the production processes, pumps, the DAF unit and the boiler. The main hazardous wastes generated by the facility will be waste sludge and treated oil filters.

3. Emissions

3.1 Emissions to Atmosphere

The main sources of emissions to atmosphere are considered to be odour emissions from the air extraction system from the waste reception/processing buildings (Emission Point A2-1), and combustion gases from the on-site light fuel oil/gas boiler (Emission Point A1-1). There is no proposed abatement of these emissions.

The main activity that may generate odours at the facility is the reception of oil/aqueous wastes. Following the initial reception, the processing, heating and treatment of all the wastes is fully enclosed and the applicant states that the quantity of vapours escaping from the process, and being extracted via emission point A2-1, will be extremely low. The RD requires that all waste processing will be carried out indoors (**Condition 8.1**), and the building will be fitted with high-speed roller shutter doors (**Condition 3**).

Minor emissions will arise from: (i) the waste oil intake/balancing tank, and (ii) the oil mixes intake/balancing tank. Potential fugitive emissions include emissions from (i) process lines, (ii) breathing losses/fugitive emissions from the clean oil tank and buffer tank and (iii) sumps, holding tank and polymer preparation tank.

Impact of Atmospheric Emissions on the Receiving Environment

The applicant completed atmospheric dispersion modelling of the odour emissions from main process emission point (A2-1) and two parameters with ambient air quality limits, i.e. nitrogen dioxide (NO₂) and nitrous oxides (NO_x) from the on-site 400kW boiler (A1-1), operating on both oil and gas. The modelling was carried out using US EPA approved AERMOD model. The dispersion model was run using five years (2000-2004) of meteorological data from Mullingar meteorological station, which is considered appropriate. Terrain data for the area at 50 metre intervals was included within the model.

The input data for the dispersion model related to the maximum predicted emission rates to atmosphere from the main extraction emission (A2-1) and boiler (A1-1) when operated on both gas and light fuel oil. The model was run based on continuous emissions from A2-1 and A2-2

during the maximum hours of operation. The emission rates used are assumed to be worst-case scenario and the atmospheric dispersion model included background concentrations.

Atmospheric Dispersion Modelling Results

The modelling results show that the maximum ground level concentrations (GLCs) for odour, NO₂, and NO_x occur close to the east/northeastern boundary of the site.

The results indicate that the maximum NO₂ and NO_x ground level concentrations to be in compliance with the National Air Quality Standards (AQS) specified in the Air Pollution Act 1987, (Air Quality Standards) Regulations 1987 (S.I. 244 of 1987) and the Air Quality Standard Regulations 2002 (S.I. 271 of 2002). The highest predicted NO₂ annual average ground level concentration will be 40% of the AQS (S.I. No. 271 of 2002).

The modelling results indicate the maximum ground level odour concentration (98%ile) to be less than 10_{UE}/m³, close to the northeastern boundary of the site. This maximum predicted odour concentration is below the proposed annoyance criteria of ≤ 15_{UE}/m³ for the 98%ile (Odour annoyance criteria – Environment Agency IPPC Horizontal Guidance for Odour Part 2 – Assessment and Control). The applicant states that odorous emissions from the facility will not have an adverse impact on any sensitive receptor beyond the site boundary.

Having regard to the atmospheric dispersion modelling result, and the boiler scale and fuel type, no emission limit values are specified within the RD. **Schedule C1.2** of the RD requires monitoring of nitrogen oxides and combustion efficiency testing to be undertaken annually.

Condition 3 of the RD requires that the fuel oil used does not have a sulphur content that exceeds 0.1% by mass.

Potential odour nuisances are controlled by **Condition 5** of the RD. **Condition 6** requires a fugitive emissions reduction programme to be prepared, based on BAT. **Condition 3** of the RD requires the applicant to provide adequate measures for the control of odours and dust emissions from the facility. Such measures shall include an odour management system. Furthermore, **Condition 6** of the RD requires an odour assessment to be carried out by a suitably qualified person and a report on the assessment to be submitted to the Agency within six months of commencement of the Scheduled Activity. The report shall identify and quantify sources of odorous emissions, and identify the remedial measures necessary to eliminate, control and contain odours as appropriate. Any recommendations contained in the report shall be implemented within a timeframe to be agreed with the Agency.

The waste reception/balance tanks will be fitted with activated carbon filters to capture potential breathing losses, during tank filling, etc. **Condition 6** of the RD requires the applicant to establish and maintain a procedure for the assessment and replacement of carbon filters fitted on the vents to atmosphere from the waste storage tank. This procedure shall be available for inspection by any authorised persons of the Agency, at all reasonable times.

Dust

The potential for dust arising from the activities is considered low. The main potential source of dust is from the movement and handling of wastes. The RD does not permit the processing of contaminated soils at the facility. The RD requires that all waste processing and the storage of contaminated soil takes place indoors (**Condition 3**). **Condition 8** of the RD requires that contaminated soil arriving at the facility shall be suitably covered in an enclosed package or skip and **Condition 6** requires the applicant to ensure that all vehicles delivering and removing waste and materials from the facility are appropriately covered. **Condition 6** of the RD requires the licensee to carry out ambient dust monitoring as may be required by the Agency and **Schedule B.6** includes ambient dust limits.

3.2 Emissions to Sewer

Emissions to sewer will arise mainly from the processing of waste oil/water mixes (from the separation of water from oil) and from the vehicle wash, which passes through a silt trap and Class II oil interceptor. The applicant states that the quantity of the emissions to sewer will depend on the nature of the incoming wastes to be treated. The calculations included in the

application predict the quantity of effluent will rise to a maximum of c. 40,000m³ per annum within 5 years. The Section 52 request sent to the Water Services Authority was based on this maximum emission figure.

Section 52 discharge consent was obtained from South Dublin County Council (SDCC). The RD contains the appropriately worded consent conditions and emission limit values as specified by the Water Services Authority, with the exception of the following: "Best Available Technology for the sector shall be used to treat and manage the trade effluent". The Agency considers that the facility satisfies BAT, as confirmed under the Best Available Techniques (BAT) section of this report.

The requirement for continuous trade effluent monitoring of flow, pH and temperature, as specified by SDCC, is included in the RD.

The ELVs for BOD, COD, suspended solids, temperature, oils, fast & greases, copper, iron, lead, zinc, chromium included in the RD are as specified by SDCC. The ELVs for these parameters are below the level requested by the applicant.

A manual, push button, shut off valve shall be installed on the trade effluent discharge line to prevent discharge to sewer in the event of an incident at the facility. **Condition 9** of the RD requires the applicant to, within three months of the commencement of the Scheduled Activity, prepare and implement procedures for the activation of the shut off valve on the storm water and trade effluent drainage network.

Condition 3 requires the applicant to colour code the surface water and trade effluent gullies, drains and manhole covers to allow for easy identification. (Surface water – blue triangles and Trade effluent – red squares).

3.3 Emissions to Waters

There are no proposed emissions to surface water from the on-site processes. Storm water runoff from the roofs, hardstanding and concrete yard areas will flow to the on-site drainage system, pass through a silt trap and a Class I full retention oil interceptor and c. 166m³ storm water attenuation tank, prior to being discharged to the industrial estate storm water sewer and in to the River Griffeen. The flow from the storm water attenuation system to the storm sewer will be restricted to 2 litres per second. The water held in the storm attenuation tank will, where necessary, be used for site operations such as floor washing or as firewater in the event of a fire on-site.

All waste handling and processing will take place within the facility buildings and loading/unloading of raw products and treated materials will take place in dedicated internal areas. The site buildings will be fully contained and all process tanks will be bunded. A manual press button shut off valve will be fitted on the discharge from the site to the surface water sewer. The RD requires the applicant to operate the shut off valves on the surface water drainage system in the event of a spillage or fire at the facility to prevent contaminated liquid from entering the surface water drainage network (**Condition 6**).

The RD requires weekly visual inspection of the storm water discharge and quarterly monitoring of chemical oxygen demand (COD), suspended solids and oils, fats and greases.

The applicant states that the main process building has been designed for the bunding of firewater/spillage within the process floor area. **Condition 3** of the RD requires the applicant to carry out a risk assessment to determine if the activity requires a firewater retention facility.

3.4 Emissions to ground/groundwater

All waste processing will take place inside the Process Buildings and there will be no emissions to ground/groundwater.

Prior to initial grant of planning permission SD06A/0035 (25th April 2006) the site was greenfield. To date the warehouse and offices constructed on the site have been unused.

The site is underlain by rocks of the Calp formation. According to the Geological Survey Ireland (GSI) aquifer classification scheme the Calp formation in the Greenogue area is a "Locally

Important Aquifer which is moderately productive in local zones". The applicant has compiled a vulnerability map using information from historical maps and available data from site investigations elsewhere in the Greenogue area. The applicant states that this information indicates a potential vulnerability rating of extreme (E).

The applicant goes on to state that there is little or no potential for contamination of the underlying aquifer from the proposed development due to design of the facility. The RD specifies a number of conditions to prevent unscheduled emission to ground, including (i) all waste delivery and processing activities shall take place indoors, (ii) loading/unloading of raw products and treated materials shall take place in dedicated internal areas. (iii) all site surfaces are to be concreted, (iv) the site buildings will be fully contained and all process tanks will be bunded, (v) all run-off/potential spillages will be directed to foul and storm drains via silt traps and interceptors with attenuation, as appropriate, and (vi) there shall be manual shut off valves on the trade effluent and storm water discharges from the facility.

Due to the hazardous properties of the liquid waste to be processed at the facility, the RD requires the applicant to submit a groundwater monitoring programme within 12 months of the date of grant of licence (**Condition 3**). The groundwater monitoring well(s) identified in this programme shall be monitored for mineral oil, BTEX and be screened for List I/II organic substances biannually, in accordance with **Schedule C.7**.

3.5 Waste Generated

The applicant states that the hazardous waste generated at the facility will include waste sludges (up to 240 tonnes per month) and oil filters (post process cleaning). The residual quantity of oil filter waste will arise from the processing of a maximum 3,000 tonnes of oil filters per annum. The hazardous wastes generated will be sent to an authorised waste facility for recovery/disposal.

Non-hazardous wastes generated at the facility will include waste rags (post process cleaning), which will be sent to a licensed landfill for disposal and domestic waste will be sent to a licensed facility for segregation, recovery and disposal.

The applicant states that a waste inspection and a waste quarantine area are not required, as all waste fluids which arrive at the facility will have been analysed at source. It is noted that this does not guarantee that every load arriving at the facility will be as described in the accompanying documentation. Therefore the RD requires the applicant to provide and maintain a designated waste inspection area and waste quarantine area within the facility buildings (**Condition 3**), so that waste loads can be checked against documentation and the waste acceptance criteria, and non-conforming wastes can be segregated.

3.6 Noise

The applicant submitted results of a baseline noise study carried out at the site on March 14th and 15th 2007 prior to site activity. The noise monitoring was carried out at four locations at the site boundary and at the nearest noise sensitive location (NSL), a residential dwelling located 520 metres southwest of the site boundary next to the R-120.

The daytime noise measurement (LAeq) at the NSL was 74 dBA. The night-time noise level at the NSL was 70 dBA. These noise levels were attributed to traffic movements on the R120. A daytime tonal component at 200Hz and night-time tonal components at 80Hz, 125Hz and 6.3kHz were attributed to passing traffic. Daytime noise at the NSL was also attributed to occasional overhead aircraft. The site is located in close proximity to Baldonnell Aerodrome.

The principal noise from the facility will be site related traffic, including HGVs, cars and forklift trucks, wash-bay use, external pumps, tank filling, and internal noise generated by the production processes, the boiler and pumps.

The applicant has calculated that noise from the proposed activity (operating all significant noise sources, internal and external for the maximum proposed working hours) will not adversely affect the existing ambient noise levels in the vicinity of the nearest NSL. This prediction is based on a worst-case scenario.

The RD requires the noise arising from the facility to meet the standard noise requirements (45dBA night-time and 55dBA daytime, measured at the facility boundary). It is acknowledged that, due to the location of the facility, noise from external sources elevate the background noise levels, however the proposed facility shall not be the cause of an increase in the noise levels above the standard noise limits (55/45dBA daytime/night time).

4. Use of Resources

The applicant has not provided predicted fuel/electricity usage figures. The applicant states that the fuel and electricity usage will depend on the proportion of different wastes received by the facility. Gas/oil will be used primarily for steam generation and process heating. Electricity will be used for pumping and lighting, etc. The applicant states that usage figures will be maintained and critically reviewed as part of the environmental management system. **Condition 7** of the RD requires the applicant to carry out an energy efficiency audit and undertake an assessment of the efficient use of raw materials. Reductions and improvements identified shall be incorporated into the Schedule of Environmental Objectives and Targets. This will ensure that energy and raw materials are used efficiently.

The water usage is estimated to be up to 1,000m³ in the first year. **Condition 7** of the RD requires the applicant to identify opportunities for water usage reduction including recycling and reuse, wherever possible.

Other raw materials used at the facility will include detergents c. 200 litres per annum, polymers and small quantities of laboratory chemicals.

5. Compliance with EU Directives

5.1 IPPC Directive (91/61/EC)

This installation falls within the scope of category 5.1 (*Installations for the disposal or recovery of hazardous waste as defined in the list referred to in Article 1 (4) of Directive 91/689/EEC, as defined in Annexes II A and II B (operations R1, R5, R6, R8 and R9) to Directive 75/442/EEC and in Council Directive 75/439/EEC of 16 June 1975 on the disposal of waste oils (2), with a capacity exceeding 10 tonnes per day*) of Annex I of Council Directive 96/61/EC concerning integrated pollution prevention and control.

The Recommended Determination, as drafted, takes account of the requirements of the Directive, which was transposed into Irish law by the Protection of the Environment Act 2003. In particular, **Condition 7** provides conditions dealing with water, energy and raw materials use, reduction and efficiency on-site. **Condition 9** addresses accident prevention and emergency response, and **Condition 10** deals with decommissioning management.

5.2 Large Combustion Plant Directive (2001/80/EC)

The Large Combustion Plant Directive 2001/80/EC does not apply to this facility as the combustion plant has a total rated thermal input of less than 50 MW.

5.3 Solvents Directive (1999/13/EC)

The proposed processes do not fall within the scope of EU Council Directive 1999/13/EC on the limitation of emission of volatile organic compounds due to the use of organic solvents in certain activities and installations.

5.4 Seveso Directive (96/82/EC)

The applicant states that the activity is not classified as a Seveso site under S.I. 74 of 2006 (European Communities (Control of Major Accident Hazards involving Dangerous Substances) Regulations) which gives effect to European Directive 96/82/EU (Seveso II Directive).

5.5 Air Quality Directive (1999/30/EC)

All emissions to atmosphere from the facility will comply with the requirements of the Air Quality Directive.

5.6 Environmental Liability Directive (2004/35/CE)

Condition 10 of the RD requires the applicant to prepare a Decommissioning Management Plan (DMP) and **Condition 12** requires the completion of an Environmental Liabilities Risk Assessment (ELRA) which addresses liabilities from past and present activities.

5.7 Water Framework Directive [2000/60/EC]

Stormwater run off only will discharge from the facility to the industrial estate's stormwater sewer, via one surface water discharge point (SW 1). This discharge will not impact on the receiving water quality (River Griffeen). There are no emissions to groundwater from the facility.

5.8 Groundwater Directive (80/68/EEC)

There are no authorised direct discharges to groundwater.

5.9 Habitats Directive (92/43/EC) & Birds Directive (79/409/EEC)

The applicant states that there are eight designated areas within 10km of the site. These include the Grand Canal - Natural Heritage Area (NHA 002104), Royal Canal (NHA 002103), Slade of Saggart and Crooksling Glen (NHA 000211), Lugmore Glen (NHA 001212), Liffey Valley (NHA 000128), Dodder Valley (NHA 000991), Glenasmole Valley – Special Protection Area (SPA 001209) and Rye Water Valley/Cartron – Special Area of Conservation (SAC 001398). All of these designated sites are found outside a 4.5 km radius of the site.

There will be no significant environmental emissions from the facility, when operated in accordance with the conditions of this RD, which would give rise to adverse effects to these or any other designated sites.

6. Waste Management, Air Quality and Water Quality Management Plans

The plans for the region have been considered during assessment of the application for a waste licence. The applicant states that the proposed facility will help towards the implementation of the objectives of the National Hazardous Waste Management Plan.

7. Best Available Techniques (BAT)

I have examined and assessed the application documentation and I am satisfied that the site, technologies and techniques specified in the application and as confirmed, modified or specified in the attached Recommended Decision comply with the requirements and principles of BAT. I consider the technologies and techniques as described in the application, in this report, and in the RD, to be the most effective in achieving a high general level of protection of the environment having regard - as may be relevant - to the way the facility is located, designed, built, managed, maintained, operated and decommissioned.

8. Environmental Impact Statement

I have examined and assessed the EIS and having regard to the statutory responsibilities of the EPA, I am satisfied that it complies with Article 94 and Schedule 6 of the Planning and Development Regulations 2001 (SI 600 of 2001) and EPA Licensing Regulations (SI 85 of 1994, as amended).

9. Fit & Proper Person Assessment

The Fit & Proper Person test requires three elements of examination:

- Technical Ability
- Legal Standing
- Financial Standing

It is my view that the applicant can be deemed a Fit & Proper Person for the purpose of this licence.

10. Submissions

There were no submissions received in relation to this licence application.

11. Recommended Determination (RD)

In preparing this report and the Recommended Determination I have consulted with Agency technical and sectoral advisors. The RD does not permit the acceptance of liquid or aqueous wastes containing dangerous substances, chlorinated oils, oils containing halogens, oils containing PCBs or edible oils at the facility.



12. Charges

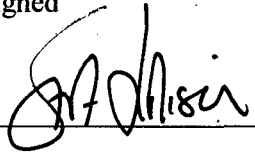
The proposed charge for this site, based on the predicted enforcement effort required, is €18,413. The Office of Environmental Enforcement has approved this charge.

13. Recommendation

I have considered all the documentation submitted in relation to this application and recommend that the Agency grant a licence subject to the conditions set out in the attached RD and for the reasons as drafted.

I am satisfied, on the basis of the information available, that the waste activities licensed hereunder will comply with the requirements of Section 40(4) of the Waste Management Acts 1996 to 2008.

Signed



Stuart Huskisson

Procedural Note

In the event that no objections are received to the Proposed Determination of the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996 to 2008.

