

OH Sub No. 26

Matt Thoney

TT - further detail of Project Agreement

Recd From: DCC

Environmental Protection Agency

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Waste inspection requirements

The Project Agreement requires that a waste inspection area ~~must be provided and~~ that PPP Co shall provide a safe and efficient means of removing waste from the inspection area either to a vehicle or to the Bunker.

The agreement also requires that The PPP Co shall undertake random inspection of all incoming waste before it is taken into the ownership of the PPP Co. If the PPP Co considers that part of the waste, that is not acceptable waste, can be readily segregated, then the PPP Co shall so segregate the unacceptable waste and the PPP Co shall accept the remainder of the waste for treatment.

DCC shall be responsible for removing any waste delivered by it or on its behalf for thermal treatment at the facility deemed unacceptable waste. In the event that any third party waste is considered to be unacceptable waste, the PPP Co shall ensure such waste to be removed from the Site or the Ancillary Site within 24 hours of being tipped.

Environmental Management

Off-Site Cleanliness - The PPP Co is required to clean roadways of any such dirt, mud or other materials that are spilt or spread by traffic travelling to or from the Site in connection with the Works.

Delivery of Waste - The PPP Co is required to provide details of how incoming waste will be handled to ensure compliance with the conditions of the EPA Licence in the prevention of pollution of the environment.

Reporting requirements

Annual Operations Report

PPP Co is required to submit an Annual Operations Report to DCC which must include:

- a summary describing overall improvements / deteriorations in the environmental performance, including reasons
- the results of all chemical analysis of the composition and leaching characteristics of the Residues following the term of stabilisation
- details of energy use, production and consumption
- details of the quantity of non product output returned to process or market by recycling or re-use
- full details of any accidental leakages
- any results from life-cycle analyses
- a copy of each report produced in accordance with the EPA Licence
- summary of monitoring results for air, noise, water and any other environmental parameters
- statistical analyses of monthly results

- details of any breaches of law in relation to environment, subsequent actions taken by Relevant Authorities and resultant changes in the Facility and Operations.

Records

The Project Agreement requires PPP Co to maintain specific records, in good order and in such form as to be capable of audit by DCC' s Representative. The PPP Co must make such records available for inspection by or on behalf of DCC and DCC' s Representative at all reasonable times.

The PPP Co must ensure that DCC' s Representative has unrestricted access to all records of the PPP Co, whether in electronic or paper form. DCC and DCC' s Representative shall be entitled to take copies of all records at the PPP Co' s cost and for that purpose to use such copying facilities as are maintained at the place where the records are kept.

Duty Operator's Records

PPP Co is required to keep the following daily running records:

- Digital and hard copy records for each Waste load entering the Facility including the name of the User, vehicle registration number, details of waste permit, quantity of Waste delivered, name of the person checking the load, details of Unacceptable Waste and the reasons for rejection.
- Written records for each consignment of Residues or Hazardous Waste removed from the Facility, including forms and/or permits that may be legally required for transporting these categories of material.
- Written records of all consignments of Other Residues leaving the Site. This shall include separate records detailing
 - the reference for the load, the quantity leaving the Site, the proposed destination and the suitability of the material for recycling as appropriate
 - the quantity accepted at the destination, details of further use of material at destination. If this includes recycling then proof shall be obtained of how much and for what use
- Automatically and manually collected data about Waste deliveries. Such information shall include for each load:
 - time of arrival;
 - weight;
 - Waste origin
 - Vehicle and driver
 - Waste type and classification
 - Additional remarks and information
- Full records of all incidents or malfunctions that affect the Operations, including a description of the outcome.
- All wastewater discharge monitoring results
- All stack emission monitoring results

- Any emissions that exceed legal limits, be they set by EU Directive, Law or the EPA Licence, as well as any emissions which exceed Performance Criteria trigger limits
- Any occurrence that has a known potential for environmental pollution and/or damage to human health
- Full records of inspections and surveys and results of such, including photographs where applicable.
- Details of all works of repair and/or replacement, including photographs, asbuilt drawings and other documentary records.
- Records of all landscape planting and of maintenance of landscape areas.
- Records of third party claims.
- Records from any verification surveys
- A register of Staff and visitors present at the Facility.
- Full set of all Certificates relating to the Operation.
- Drawings showing the location of all agreed permanent measurement and sampling points throughout the Facility.

Monthly Operations and Gate Fee Report

PPP Co is required to provide to DCC a report, the “**Monthly Operations and Gate Fee Report**” within 5 working days after the end of each calendar month during the Operational Period , which shall include:

- for each day of the reporting period and for each hour during such day:
- the aggregate number of waste vehicles entering the Facility, categorised by the name of the User, with corresponding daily and monthly totals;
- the aggregate weight of Waste delivered, categorised by User with corresponding daily and monthly totals;
- the aggregate weight of unacceptable waste, categorised by name of User with corresponding daily and monthly totals;
- the Gate Fee as it applies to each User for the month to which the Monthly Operations and Gate Fee Report pertains;
- details of the payment status of each User from the preceding month’ s bill and outstanding charges due by any User;
- receipts of any Government Levies on Thermal Treatment.
- for each day of the reporting period:
- details of the Gate Fee applicable to each User and the aggregate Gate Fee due from all Users for the designated period. All charges shall be shown in Euro
- the ratio of the aggregate number of waste vehicles delivering to the Facility, categorised by User and weight with corresponding monthly totals, to:
 - the equivalent information obtained from the Monthly Operations and Gate Fee Report of the preceding month; and
 - (from the second year of Operation onwards) the equivalent information obtained from the Monthly Operations and Gate Fee Report for the corresponding month in the preceding year;
- the ratio of total weight of Waste delivered with corresponding monthly totals, to:
 - the equivalent information obtained from the Monthly Operations and Gate Fee Report of the preceding month; and

- (from the second year of operation onwards) the equivalent information obtained from the Monthly Operations and Gate

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Thermocouples

The boiler temperature will be measured by three or more thermocouples. The probes normally used comprise Nickel-Chromium-Nickel or Platinum-10%Rhodium-Platinum which can be used up to a temperature of approximately 1,350°C. The probes have a lifetime of approximately 5-8 months.

Sludge Moisture Content

The following two types of sludge are produced at the Ringsend WWTP:

- dried sludge at 92% dry solids and 8% moisture (heat dried)
- cake sludge at 25% dry solids and 75% moisture (belt press)

Sludge Clarification

1. The application for an EPA licence is to thermally treat a maximum of 600,000 tonnes, as correctly understood by the EPA and the EPA Inspector.
2. The Applicant seeks permission to take, subject to planning permission, up to 80,000 tonnes of sludge from the adjacent wastewater treatment works (WWTW)
3. It was unclear at the time of the application whether what is treated at the WWTW is properly classified as domestic or commercial (non-hazardous) sludge. Be that as it may the applicant seeks a licence to thermally treat up to a maximum of 80,000 tonnes of sludge all of which would emanate from the adjacent WWTW.

[The Applicant is happy for the EPA to refine the EWC codes as outlined in Schedule A.1 Waste Categories and Quantities for Acceptance at the incineration plant of the Proposed Decision to reflect this clarification]

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