amc environmental ltd 3c heron wharf heron road belfast bt3 9le

ENVIRONMENTAL PROTECTION AGENCY

2 2 AUG 2008

tel. 028 9073 0010 fax. 028 9073 0011

www.moagconsulting.com

Noeleen Keavey Licensing Unit Office of Climate, Licensing and Resource Use EPA Headquarters PO Box 3000 Johnstown Castle Estate Co Wexford

20th August 2008

Dear Noeleen

Re: Response to Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations

Licence Register No:	WO197-02 200 200
Licensee:	Wallace Recycling Ltd
Location of Facility:	14-17 Mullingar Business Park, Mullingar, Co Westmeath

Further to your letter of 29th July 08, in relation to Article 12 Compliance requirements, as Agents to Wallace Recycling Ltd, our response is as follows:

1. Provide information in writing from the relevant planning authority that an Environmental Impact Statement is not required to be prepared to facilitate the requested increase in annual waste acceptance to 100,000 tonnes per annum.

Please find enclosed a letter that has been sent to the Planning Authority asking for a declaration as to whether the site needs planning permission and/or an environmental impact statement. The reply will be forwarded to you as soon as it is received.

2. Indicate the principle class of activity on Table B.7.1 in the licence application form.

The principal class of activity is indicated on the application form (see page 17 enclosed)

3. Complete tables E3(i) and E.3(ii) for all emissions to sewer i.e. EF1, EF2 & EF3. Provide details of the storm water drainage system on site

The completed tables E3(i) and (ii) are enclosed, including details of storm water drainage on site

4. Complete Table F.1 for all abatement and treatment control technologies/equipment employed on site.

The completed table F1 is enclosed.

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registered in northern ireland no. NI 067573

vat registration no. GB 925 6865 85 A revised Table F2 is also enclosed.

A revised non-technical summary has not been provided as the information provided does not impinge on the non-technical summary.

Enclosed are two copies of the requested information in electronic searchable PDF format on a CD-ROM. Please note that the CD-ROM contains the amended pages of the application form and the entire amended application form.

Yours sincerely

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Heather Loughlin Associate Principal Consultant Area office: Crohane, Killenaule, Thurles, County Tipperary, Tel 052 55978.



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Planning Section Westmeath County Council County Buildings Mullingar County Westmeath

8th August 2008

Dear Sir or Madam

Request under Section 5 of the Planning & Development Act 2000

Further to your recent letter (copy enclosed), and in accordance with Section 5 of the Planning & Development Act 2000, I am writing to request a declaration as to whether a development requires planning permission and also whether an <u>environmental impact assessment</u> is required.

The location of the site is Units 14-17 Mullingar Business Park, Mullingar, Co. Westmeath. A non technical summary providing details of the proposed changes at the site is attached.

Planning permissions in relation to the site are 02821 and 055532.

Drawings showing the site location and layout of the facility are also attached.

We would be grateful if you would consider the fact that the facility is currently only processing 25,000 tonnes per annum. The 100,000 tonnes limit requested in the application for the review of the Waste Licence is unlikely to be reached in the short term.

A cheque for €80 is enclosed as the fee for this declaration request.

I look forward to hearing from you in due course.

Yours sincerely

Heather Loughlin Associate Principal Consultant Area office: Crohane, Killenaule, Thurles, County Tipperary, Tel 052 55978.

> registered in northern ireland no. NI 067573

vat registration no. GB 925 6865 85



WASTE Application Form

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B.7 Type of Waste Activity, Tonnages & Fees

2-2 AUG 2008

B.7.1 Specify the class or classes of activity in Table B.7.1, in accordance with the Third Schedule or Fourth Schedule to the Waste Management Acts 1996 to-2003, to which the application relates (check the relevant box(es) and mark the principal activity with a 'P').

Attachment B.7 should identify the principle activity and include a brief technical description of each of the other activities specified. There can only be one principal activity.

 TABLE B.7.1 THIRD AND FOURTH SCHEDULES OF THE WASTE MANAGEMENT

 ACTS 1996 TO 2003

THIRD SCHEDULE Waste Disposal Activities	Y/N	FOURTH SCHEDULE	Y/N
1. Deposit on, in or under land (including landfill).		1. Solvent reclamation or regeneration.	
2. Land treatment, including biodegradation of liquid or sludge discards in soils.		2. Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological processes).	Y
Tepusitunes.	n purpos	3. Recycling or reclamation of metals and metal compounds.	Y
4. Surface impoundment, including placement of liquid or sludge discards into pits, ponds or lagoons.	WINC	4. Recycling or reclamation of other inorganic materials.	Y
5. Specially engineered landfill, including placement into lined discrete cells which are capped and isolated from one another and the environment.		5. Regeneration of acids or bases.	
6. Biological treatment not referred to elsewhere in this Schedule which results in final compounds or mistures which are disposed of by means of any activity referred to in paragraphs 1 to 5 or paragraphs 7 to 10 of this Schedule.		6. Recovery of components used for pollution abatement.	
7. Physico-chemical treatment not referred to elsewhere in this Schedule which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1 to 5 or paragraphs 8 to 10 of this Schedule (including evaporation, drying and calcination).		7. Recovery of components from catalysts.	
8. Incineration on land or at sea.		8. Oil re-refining or other re-uses of oil.	
9. Permanent storage, including emplacement of containers in a mine.		9. Use of any waste principally as a fuel or other means to generate energy.	
10. Release of waste into a water body (including a seabed insertion).		 The treatment of any waste on land with a consequential benefit for an agricultural activity or ecological system. 	
11. Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule.	Y	11. Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule.	
12. Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.		12. Exchange of waste for submission to any activity referred to in a preceding paragraph of this Schedule.	
13. Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.	Y	13. Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced.	Y (P)

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

Emission Point:

Emission Point Ref. Nº:	EF1
Location of connection to sewer :	South east corner of site
Grid Ref. (10 digit, 5E,5N):	
Name of sewage undertaker:	Westmeath County Council

Emission Details:

(i) Volume to be emi	tted		
Normal/day	· m ³	Maximum/day	10 m ³
Maximum rate/hour	5 m ³	5 off and	

(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)	ent of min/hr hr/day day	//yr

Please note that monitoring is only being carried out at one point, EF1, not the three points specified in Licence W0197-01. The location of this monitoring point is shown on 'Drawing F Monitoring & Sample Locations'

On the 26th February 2007 correspondence was sent to the EPA Inspector requesting a review of the frequency of sewer emission monitoring. A meeting was held with two members of the EPA enforcement section on 22nd March 2007 to progress this issue. A change to the effluent sampling frequency has been granted, allowing for sampling to take place once per annum for all parameters.

The drainage layout is provided on 'Drawing B2(c) Services Plan'. Emissions to the combined foul and storm sewer located adjacent to the northern site boundary are via interceptors situated external to the materials recycling building and at the site entrance. There are a further two interceptors in the yard to the south of the materials recycling building and these discharge to the foul sewer which runs along the southern boundary.

ANNEX - Standard Forms

WASTE Application Form

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TABLE E.3(ii): EMISSIONS TO SEWER - Characteristics of the emission (1 table per emission point)

EPA Export 26-07-201

Emission point reference number : EF1

Parameter		Prior to treatment	reatment	-		As discharged			% Efficiency
	Max. hourly average (mg/l)	Max. daily average (mg/l)	kg/day 🔌	other kg/year	day on kg/year Max. hourly average N		kg/day	kg/year	
pH		7.1		hty. A		. 7 1			
BOD		20 8		Ses C					
COD					Petr	5,60			
		55			iton itow	55			
Suspended Solids		25.4			r inspe opyrig	25.4			
Ulls, fats & grease		7.2			F°				
Diesel Range Organics		<1mg/1			Conse	<1mg/1			

The values reported in the table above are the values reported in the most recent AER for the site (2007)

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TABLE F.1: ABATEMENT / TREATMENT CONTROL

Emission point reference number : EF1_

Not applicable to this review application

Control ¹ parameter	Equipment ²	Equipment maintenance	Equipment calibration	Equipment back-up
Oil removal	Class II full retention oil separators	Weekly inspection, desludging as necessary.	Not applicable	access to standby and/or spares
Suspended solids	Silt traps	Weekly inspection, deshudging as necessary.	Not applicable	access to standby and/or spares
			metuse.	

		OTHY any	
Control ¹ parameter	Monitoring to be carried out ³	Monitoring equipment	Monitoring equipment calibration
Oil removal	Oils fats and greases, DRO, COD, BOD	Grab sample	Not applicable
Suspended solids	Suspended solids (8)	Grab sample	Not applicable
	Consent of Con		

¹ List the operating parameters of the treatment / abatement system which control its function.

² List the equipment necessary for the proper function of the abatement / treatment system.
 ³ List the monitoring of the control parameter to be carried out.

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TABLE F.2 to F.8 : EMISSIONS MONITORING AND SAMPLING POINTS

(1 table per media)

Emission Point Reference No(s). : EF1, Emissions to Sewer

F					ن د جور	aly.	any other	US
Accessibility of Commission Defect	On line flow meter with more and	On line temperature profession with monoran	pH electrode/meter and recorded	Standard method	Standard method	Standard method	Standard method	
Monitoring frequency	Annual	Annual	Annual	Annual	Annual	Annual	Annual	
Parameter	Flow	Temperature	рН	Chemical Oxygen Demand	Biochemical Oxygen Demand	Suspended Solids	Dicsel Range Organics	

Please Note: The monitoring frequency for emissions to sewer provided in Waste Licence 197-1 was felt to be too onerous. Written correspondence with the Agency requested that the frequency be reviewed. This was duly done and monitoring on sewer emissions to now undertaken on an annual basis.

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EPA Export 26-0'