



0 5 SEP 2008

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Licensing Unit
Office of Climate, Licensing and Resource
EPA Headquarters
PO Box 3000
Johnstown Castle Estate

Co Wexford

Noeleen Keavey

3<sup>rd</sup> September 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
Licensee:	Wallace Recycling Ltd
Location of Facility:	14-17 Mullingar Business Park, Mullingar, Co Westmeath

Further to your letter of 29<sup>th</sup> July 08, in relation to Article 12 Compliance requirements, as Agents to VVallace 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.

registered in northern ireland no. NI 067573

vat registration no. GB 925 6865 85 The completed table F1 is enclosed.

A revised Table F2 is also enclosed.

5. Resubmit Table H.1(A) of the licence application form indicating the quantities of waste in relation to each class of activity applied for. The total quantity should equal 100,000 tonnes per annum.

A revised Table H.1(A) is enclosed

6. Clarify the current waste acceptance amounts at the facility.

The current waste acceptance amounts are provide in the attached table. This table is an extract from the 2007 AER for the facility.

7. With regard to waste generated and accepted on-site, provide information on the quantity produced, and the reuse, recovery and/or disposal routes of each waste stream.

The table referred to in the question above contains this information.

8. When are composting processes proposed to begin on site? Supply complete and comprehensive details of the source and treatment of compostables and putrescibles to be carried out on site. Clarify what grade of compost/stability standard is to be produced at the composting facility. Supply information on the infrastructure to be put in place on site for the composting of waste.

Please note that Wallace Recycling now only intends to collect green waste and process it on site using a mobile shredder. It will then be moved off-site for composting. The site infrastructure plan has been amended accordingly. No composting will be carried out on site.

9. Supply complete and comprehensive details of the end of life vehicle depollution process to be carried out on site. Supply details of the source and treatment of the end of life vehicles on site and the destination of the depolluted parts.

End of life vehicles (ELVs) will be accepted from the public, commercial customers and Westmeath County Council.

Depollution of ELVs at the facility will include preliminary activities, followed by depollution of the vehicle (removal of fluids and other items).

The preliminary which need to be conducted are:

- Use of IDIS (International Dismantling Information System) or other manufacturer guidance to obtain depollution information on the ELV
- Determine if ELV has airbags
- Lower windows (if required)
- Remove battery
- Remove fuel cap and oil filler cap
- Set heater control to maximum
- Remove wheels/tyres

### \* Remove lead balance weights from wheels

All of these activities need to be conducted before the ELV is placed on a support frame to enable the main depollution activities to be carried out.

An example sequence for the depollution of an ELV is shown in Table 1 below. The table indicates whether an individual operation is best conducted either above (A) or below (B) the ELV.

### Table 1 - Depollution sequence

Although a number of the below-vehicle operations can be conducted in parallel, the sequence of operations shown in Table 1 maximises the time for gravity draining of the engine oil.

Above / below vehicle?	Activity
Α	Remove battery
Α	Remove fuel filler cap and oil filler cap
Α	Set heater to maximum
Α	Remove wheels and separate lead balance weights
Α	Remove any parts identified as containing mercury
	Put vehicle onto support frame
В	Drain engine oil and remove oil filter
В	Drain transmission oil, including rear differential if applicable
Α	De-gas air conditioning unit (if fitted)
В	Drain coolant
В	Drain brake fluid
В	Remove catalyst (if fitted)
Α	Drain washer bottle Drain brake / clutch reservoir (of fitted)  Drain power steering reservoir (if fitted)
Α	Drain brake / clutch reservoir
A	Drain power steering reservoir (if fitted)
В	Drain fuel tank
В	Drain shock absorbers of remove suspension fluid
В	Replace drain plugs / fit plastic stoppers
	Remove vehicle from support frame
Α	Remove air bags (if fitted, and can not be deployed in-situ)
Α	Deploy airbags in-situ (if fitted and able to conduct this operation)

The following fluids will be removed from the ELVs:

- engine oil
- transmission oils
- hydraulic oils
- screen-washing fluid
- fuel tank
- suspension system fluid
- air conditioning refridgerant

All fluids which are removed will be stored in separate containers in a bunded storage area prior to specialist recovery or disposal. As a minimum, separate containers will be provided for each fluid separately identified as a category in the Hazardous Waste List.

The ELV will need to be placed on a support frame which allows easy access below the vehicle before a number of these operations can be conducted.

The first activity to be conducted is to start draining of the engine oil. Other activities can be conducted in parallel, but the engine oil can typically take 20 minutes to reach the point where no further draining is visible.

A Fuel De-pollution Unit (FDU) will be used to extract fuel from vehicles and mobile tanks will be used to remove non flammable fluids.

The FDU extracts Petrol or Diesel from under the vehicle by puncturing the tank or siphoning through the filler cap. ATEX certified, the unit allows the operator to grade clean or dirty fuel before pumping it to an external storage facility.

VVater and hydraulic based fluids are removed by mobile tanks, these units use compressed air through a venturi to create a vacuum in the tank which is then used to suck the fluid from the vehicle. Once full the mobiles can be discharged by pressurising the tank and blowing the fluid out.

Engine oil is removed by placing a mobile unit with a top mounted funnel under the vehicle to drain the oil through the sump plug or a punctured hole.

The system requires 20cfm of compressed air at 7 bar

Any undeployed air bags or seat belt pre-tensioners will be removed or deployed.

As air bags are electrically operated, they can be disabled by disconnecting the battery of the ELV. However, they need to be removed or deployed in order to prevent problems occurring during subsequent metal recycling operations.

It is proposed that airbags will be deployed whilst still in the vehicle using a purpose made air-bag deployer.

Car doors will be left open or the windows will be lowered before the air bags are deployed to avoid possible glass breakage and expulsion resulting from 'containment' of the explosive force.

Following depollution, the depolluted parts will be transported to Hammond Lane or similar facility for onward recycling.

10. Provide details on the expected completion dates for the end of life vehicle depollution shed.

It is expected that the ELV depollution shed will be completed in January 2009.

11. Provide details of the sealed drainage infrastructure in the vehicle depollution shed.

It is proposed the de-pollution activity will take place on an impermeable concrete surface within a purpose built de-pollution shed adjoining the north west gable of the materials recycling shed. All storage tanks, drums and other containers used for the storage of fluids will be stored within a bunded or silled area with an impermeable surface within the depollution shed and be isolated from the drainage system. The building itself will be sealed to prevent any spillages from entering the site drainage system.

Spillages will be contained using spill kits.

Vehicles that have not been fully de-polluted or are awaiting depollution will also be stored on an impermeable surface in a bunded, roofed storage area as will oil contaminated spare parts.

12. Outline the potential noise impacts due to air bag deployment.

There are two alternative methods for deploying air bags — either in-situ or following removal from the vehicle. The predominant method used at present is in-situ deployment.

It is proposed that all vehicles will have their airbags deployed in-situ and within the depollution shed, which will help to mitigate the noise impacts.

The level of noise likely to be generated during the deployment of airbags is not known by the suppliers of the equipment. As such it is recommended that noise levels are assessed and if noise reduction measures become necessary the following options could be considered:

- Use of a purpose designed 'blanket' which is placed over the car during airbag deployment.
- \* Use of soundproofing in the vehicle depollution shed.
- Removal of airbags and deployment in a soundproofed unit.
- 13. Provide details of the civic amenity site operated at the facility i.e. management, waste acceptance amounts, desired hours of operation, etc.

There are a number of containers located at the facility, which are provided for use by the general public for deposition of household waste and recyclables including the following:

- ₩ WEEE
- **♦** Car batteries
- 排 Drink cans
- Newspapers and magazines
- **⊕** Cardboard

The materials collected in these receptacles are bulked up (depending on the waste type) and removed off-site for recovery/recycling.

Waste acceptance amounts are estimated at 1,300 tpa for recyclables and 1,200 tpa for residual waste.

Proposed hours of Waste Acceptance for the Civic Amenity Area are 8am to 6pm, Monday to Saturday.

14. Submit details of the number of staff currently employed at the facility.

There are currently 27 staff employed at the facility. 5 of these are clerical/admin staff, 5 are drivers and 17 are site operatives.

15. Submit information on the quantity of energy, electricity, oil, water, etc. used on site on an annual basis.

Energy at the facility is provided by electricity supplied by the ESB; there are no boilers or burners of other fuel types used on site.

Electricity usage for January to December 2007 based on consumption and cost reports from the ESB was 37.5 Megawatts.

Based on the latest water meter reading information supplied by Westmeath County Council, the water usage in 2007 was 127m<sup>3</sup>.

16. Submit numbered and fully labelled drawings showing the following: Site layout plan, including proposed designation of use of all site buildings and external areas; Raw materials and waste storage on site; Nearest sensitive receptors to the site, stating the distance.

The following revised drawings are enclosed:

- Services Plan Drawing B2(c)
- Site Plan Drawing B2(a)
- Site Infrastructure Drawing D1

17. Is the facility located in or nearany designated sites? State the distance to the nearest designated site and provide details of any potential impacts on the site.

The facility is located 80.5m from the Royal Canal, a Proposed Natural Heritage area (refer to Drawing B2(a) for location. It is not anticipated that the facility would have any impact on this proposed designated site as it is located within a pre-existing industrial estate.

A revised non-technical summary is enclosed been provided as the information provided above impinges 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

**Heather Loughlin** 

Associate Principal Consultant

Area office: Crohane, Killenaule, Thurles, County Tipperary, Tel 052 55978.

## **APPENDIX 1 - Waste Management Record For 2007**

The following information is an extract from the 2007 Annual Environmental Report for the Facility:

In order to improve our data collection systems, Wallace Recycling introduced a new software system in November 2007. During the transfer of weighbridge data from the old system to the new system some information was not transferred correctly and as a result the figures below had to be based on estimates.

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### **Attachment A.1 Non Technical Summary (Revision 1)**

This attachment forms the Non Technical Summary for the review of waste management licence 197-1 for Wallace Recycling Ltd. The information in the Waste Licence Review Application Form and Attachments A-M is provided to comply with the requirements of Article 12 (1) (u) of the Waste Management (Licensing) Regulations, S.I. 395 of 2004.

Wallace Recycling Ltd operates a waste transfer and recycling facility at existing licensed premises at Units 16-17 Mullingar Business Park, Mullingar Co Westmeath.

In 2007 Michael Wallace completed the purchase of the 1 acre site which adjoins the original licensed area. This increased the overall size of the facility to 2 acres providing extra space for improved storage, new waste streams and additional car parking. A site plan (Drawing B.2(a)) and location map (Drawing B.2 (b)) is attached.

The following waste related processes are currently authorised:

- i. shredding, crushing, baling, repackaging processes,
- ii. C&D waste recovery (incl screening, sorting, blending),
- iii. Storage of waste,
- iv. Recovery of dry recyclables.

It is Wallace Recycling Ltd's intention apply for increased tonnage at the facility (from 50,000 tonnes to 100,000 tonnes per annum), to construct a dedicated shed for the depollution of end-of-life vehicles and become an authorised treatment facility, and to continue with the recovery of waste and inherent disposal as regulated by the EPA under Waste Licence 197-1.

Planning permission has been obtained for the waste transfer and recycling activities which are carried out on Units 16-17 of the site. Technical Amendment to waste Licence 197-01 was approved by the Agency in 2007 to allow the adjacent facility ie Units 14-15 to be used to store empty waste receptacles, containers of recyclables awaiting collection, containers of green waste, glass, white goods etc and for additional staff car parking. The use of this adjacent facility for the storage of skips, and vehicles improved overall capacity at the site and allowed better utilisation of the existing facility through improved housekeeping and a safer working environment.

The continued screening and sorting of C&D waste and the shredding of green waste and timber is proposed to be carried on this area.

Wallace Recycling Ltd is the only EPA waste licensed facility in Co Westmeath. As such it is a key facility in terms of compliance with the requirements for the Waste Management Plan for the Midlands region. Wallace Recycling Ltd have continually improved their waste and recycling facility through the introduction of new plant, IT facilities, buildings and the provision of a civic amenity area to facilitate the public when the nearby Marlinstown facility closed at the beginning of 2007.

The proposed facility upgrades will serve to improve the existing recycling infrastructure in the Mullingar area, provide additional capacity for the de-pollution of end-of-life vehicles in the area and reduce the region's reliance on landfill.

### **Environmental Impacts of Significance**

There are no emissions to air, surface water or groundwater of environmental significance from the facility, which is currently licensed by the EPA. Due to the nature of the activity there may fugitive dust emissions from material movements and some waste processing activities. Emissions to sewer are monitored and reported to the EPA as set out in the Waste Licence and associated correspondence.

Generally given the industrial location of the site noise nuisance is not currently perceived to be an issue and noise surveys are a requirement of the waste licence. The vehicle depollution activity may give rise to additional noise, particularly from the deployment of air bags.

### **Mitigation Measures**

Wallace Recycling Ltd will put in place measures to mitigate where necessary emissions and nuisances arising from their activities on site, in accordance with the requirements of the current waste licence and any future requirements arising from the waste licence review application procedure.

With regard to the deployment of airbags in end of life vehicles, this activity will be carried out indoors which will reduce noise emissions. The impact of this activity will be monitored and mitigation measures will be put in place if necessary.

### **Operating Hours**

Normal operating hours are between the hours of 7.00am to 11.00pm Monday to Saturday inclusive, while waste acceptance is between the hours of 7.30am and 7.30pm Monday to Saturday.

At the Civic Amenity area, waste acceptance is from 8am to 6pm, Monday to Saturday.

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



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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 environmental impact assessment 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 8865 95



### **WASTE Application Form**

### **B.7** Type of Waste Activity, Tonnages & Fees

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

Waste Manage	ment	Acts 1996 to 2003	
THIRD SCHEDULE Waste Disposal Activities	Y/N	FOURTH SCHEDULE  Waste Recovery Activities	Y/N
Deposit on, in or under land (including landfill).		Solventoeclamation or regeneration.	
<ol><li>Land treatment, including biodegradation of liquid or sludge discards in soils.</li></ol>	Ž	Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological processes).	Y
3. Deep injection of the soil, including injection of pumpable discards into wells, salt domes or naturally occurring repositories.	Purpositi	3. Recycling or reclamation of metals and metal compounds.	Y
Surface impoundment, including placement of liquid or sludge discards into pits, ponds or lagoons.	ale.	Recycling or reclamation of other inorganic materials.	Y
<ol> <li>Specially engineered landfill, including placement into lined discrete cells which are capped and isolated from one another and the environment.</li> </ol>		5. Regeneration of acids or bases.	
6. Biological 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 7 to 10 of this Schedule.		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.		Oil re-refining or other re-uses of oil.	
<ol><li>Permanent storage, including emplacement of containers in a mine.</li></ol>		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.	
<ol><li>Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.</li></ol>		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)



### WASTE Application Form

### 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 emitte	d .	,	
Normal/day	m <sup>3</sup>	Maximum/day	10 m <sup>3</sup>
Maximum rate/hour	5 m <sup>3</sup>	es of the strik	

(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)	gen of the	min/hr	hr/day	day/yr
	<u> </u>			

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 26<sup>th</sup> 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 22<sup>nd</sup> 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.



### WASTE Application Form

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

Emission point reference number: EFI

Parameter		Prior to treatment	eatment			As discharged			% Efficiency
	Max. hourly Max. daily average (mg/l) (mg/l)	Max. daily average (mg/l)	kg/day C	kg/year	kg/year Max. hourly average May (mg/l)	Max. daily average (mg/l)	kg/day	kg/year	
hН		7.1		or insp		7.1			The state of the state (State of the state o
вор		39.8		hto	ction s	39.8			
СОД		55			juty <sup>058</sup> jetredi	55			···
Suspended Solids		25.4			ited fo	25.4			-
Oils, fats & grease		7.2			, any c	7.2			
Diesel Range		<li>slmg/l</li>			ither w	٧			
Organics					ŵ.				

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

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

(1 table per media)

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

Parameter	Monitoring frequency	Accessibility of Sampling Points
Flow	Annual	On line flow meter with recorder
Temperature	Annual	On line temperature probewith recorder
4	Annual	pH electrode/meter and recorder
Chemical Oxygen Demand	Annual	Standard method
Biochemical Oxygen Demand	Annual	Standard method
Suspended Solids	Annual	Standard method
Diesel Range Organics	Annual	Standard method

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.

ANNEX - Standard Forms



### SECTION H MATERIALS HANDLING

### H.1 Waste Types and Quantities - Existing & Proposed

Provide an estimation of the quantity of waste likely to be handled in relation to each class of activity applied for. This information should be included in Table H.1(a).

TABLE H.1(A). QUANTITIES OF WASTE IN RELATION TO EACH CLASS OF ACTIVITY APPLIED FOR

3. 4 60 61	1	ement Act  oosal) Activities		17.7	ement Act overy) Activities
Class of Activity Applied For		Quantity (tpa)	Class of Activity Applied For		Quantity (tpa)
Class 1			Class 1		1150
Class 2			Class 2	S	210,000
Class 3			Class 3	X	15,000
Class 4			Class 4	х	20,000
Class 5			Class 5		
Class 6			Class 6		
Class 7			Class 7		
Class 8		S	Class 8		
Class 9		of its	Class 9		
Class 10		to day	Class 10		
Class 11	х	10,000	Class 11		
Class 12		(E)IL	Class 12		
Class 13	х	20,000	Class 13	X	25,000

In Table H. 1 (B) provide the annual amount of waste handled/to be handled at the facility. Additional information should be included in **Attachment H.1.** The tonnage per annum should be given of that expected for the life of the licence, with at least the next five years tonnages provided. For Landfill Review applications provide an estimate of the quantity of waste already deposited in (i) lined cells; (ii) unlined cells.

TABLE H.1(B) ANNUAL QUANTITIES AND NATURE OF WASTE

Year	Non-hazardous waste (tonnes per annum)	Hazardous waste (tonnes per annum)	Total annual quantity of waste (tonnes per annum)
2009	63,000	2,000	65,000
2010	83,000	2,000	85,000
2011	98,000	2,000	100,000
2012	98,000	2,000	100,000



