

ATTACHMENT J

Accident Prevention & Emergency Response

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ATTACHMENT J

Accident Prevention & Emergency Response

The Material Recovery Facility will be operated in compliance with the latest Health & Safety Regulations.

In relation to 'Accident Prevention and Emergency Response', there are 2 contingencies that must be allowed for:

1. Accidental fuel spillage;
2. Fire within the facility.

Notification:

In the event of an emergency the following are to be notified.

1. Fire Services – in the event of a fire or a significant fuel spillage or serious accident involving mobile plant;
2. Ambulance Services/Medical Team – should there be a threat to human life or serious injury;
3. Gardai – In the event of fire, explosion or road accident;
4. Senior Personnel – Lennon Quarries Ltd. Managing Director - Mr. T.J. Lennon and Facility Manager - Mr. Dermot Lennon;
5. Environmental Protection Agency;
6. North Western Fisheries Board – should there be any treat to watercourses in the area of the spillage.

Control of Operations:

In the event of any Accident/Emergency, the Deputy Facility Manager/Machine Operative will take control.

Communications:

It is essential that the following communication systems are available for priority usage during an emergency:

1. Fire Services Radio Link;
2. Garda Radio Link;

3. Ambulance Services Radio Link – linking the mobile units to the medical officers and the hospital;
4. Private lines – either landlines or mobile phones to enable contact between all parties concerned and their respective headquarters.

All parties involved in the Emergency Response Procedure will be issued with this draft proposal. Any recommendations by the Agency will be adhered to and a final copy of the approved procedure will then be circulated to all parties.

Response Procedures:

1. Accidental fuel spillage:

As stated above, it is not proposed to store any fuel onsite. A Fuel Tanker will visit the site on a weekly basis (or when required) to fill the onsite plant (Hitachi 200 excavator) and generator (for Portocabin). This refueling will be carried out on the proposed concrete hardstand area, in order to ensure that any minor fuel leaks will be collected by the concrete hardstand drainage system, and directed through the proposed petrol interceptor.

In the event of a larger fuel spillage, either from the site plant or refueling tanker, the emergency procedures listed below will be followed:

In the event of a threat to surface water the following is to be implemented:

- Inform the North Western Fisheries Board and the EPA;
- Contain any spillage within the perimeter drain locally, as far as possible, by damming with excavated material or booms;
- Pump water held back by the dams into tanker or lined cell;
- Detect source and carry out necessary remedial works;
- Monitor situation hourly until threat is removed.

In the event of a threat to groundwater:

- Inform the EPA;
- Detect source and carry out necessary remedial works;
- Monitor situation daily until threat is removed.

In the event of a threat to outside the site:

- Detect source;
- Inform the EPA;
- Monitor extent of contamination;
- Inform public if risk is posed;

- Take appropriate action to alleviate situation.

2. Fire in the Facility:

Fire within site confines:

- Call Fire Services;
- On arrival of Fire Services liaise with fire officer and follow his directions.

Fire in incoming vehicle:

- Call Fire Services;
- Instruct driver to unload at Inspection Area;
- Initiate on site fire drill;
- On arrival of Fire Services liaise with fire officer and follow his directions.

Fire outside boundary but adjacent to facility:

- Call Fire Services and direct to scene;
- On arrival of Fire Services liaise with Fire Officer and monitor closely for risk of fire spread into facility;

Explosion:

- Evacuate immediate area;
- Call Fire Services, Ambulance Services, Medical team in the event of fire or serious injury;
- Close main gate to incoming traffic;

The Deputy Facility Manager/Machine Operative will have to take precautions at their facility in regard to fire abatement, response, training and awareness. These include:

- To provide and maintain suitable fire extinguishers in the Portocabin and site plant (Hitachi 200 excavator);
- Fire Safety Systems - telephone numbers of local fire, police and hospital are posted at head height on the wall in the site office;
- Emergency Response Procedures;
- Fire Prevention and Containment Design Features.

A copy of Lennon Quarries Ltd. 'Liability Insurance Schedule' is attached overleaf, with 'Public Liability' for €6.5 million.

LIABILITY INSURANCE SCHEDULE

Policy Number : CLC 5065

Assured's Name: T J Lennon and Lennon Quarries Ltd

Postal Address:

GLENCASTLE
BUNNAHOWEN
Co. MAYO

Business Address:

GLENCASTLE
BUNNAHOWEN
Co. MAYO

Broker : GYMO-MULRYAN O'GORMAN ASSOCIATES

Business Description: Suppliers of road chippings, crushed stones, sand, gravel, ready mix concrete, plant hire and civil engineering, quarry owners and operators.

Period of Insurance: From 12:01:00AM on the 05 JUL 2008 to 12:15:00PM on the 05 JUL 2009

Premium: First/Additional: E28,000.00 Minimum Retained: E28,000.00 Annual Premium: E28,000.00

Employers Liability - SECTION (1) Operative: Yes

Description	No.'s	Wages
Clerical, Managerial and non-manual wages		125,000
Fireman/Fitters		75,000
Drivers		250,000
All other employees		240,000
Total Wages/Salaries		E690,000

Limit of Indemnity: Any One Occurrence E13,000,000 - Any one Period Unlimited

Excess Each and Every Claim: E1,250

ENDORSEMENTS APPLICABLE: L103,L108

Public Liability - SECTION (2) Operative: Yes

Description	Wages
Turnover	4,000,000
Bona-Fide Subcontractors	50,000

Limits of Indemnity (Except for a. and b. below) E6,500,000 Any One Occurrence)

a. Fire and Explosion E6,500,000 Any One Occurrence) and Unlimited in Any One Period

b. Weakening and Removal of Supports E6,500,000 Any One Occurrence)

Excesses: Each and Every Claim E1,250 ; Third Party Property Damage Only E0

ENDORSEMENTS APPLICABLE: L44,L95,L102,L103,L104,L105,L106,L107,L108

Product Liability - SECTION (3) Operative: Yes Included in Section 2 Premium: Yes

Limits of Indemnity E6,500,000 in the Period of Insurance.

Excesses: Each and Every Claim E1,250 ; Third Party Property Damage Only E0

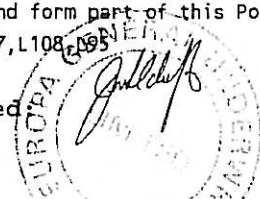
ENDORSEMENTS APPLICABLE: L44,L95,L102,L103,L104,L105,L106,L107,L108

The following endorsements are also attached to and form part of this Policy:

Special Endorsements L102,L103,L104,L105,L106,L107,L108,L95

Dated: 23 OCT 2008

Signed



Notice to Assured:

Jurisdiction: Both the Assured and Europa General Insurance Company Ltd can choose the law within the European Union which will apply to the contract. We propose that Irish Law will apply.

Europa General Insurance Company Ltd is regulated by the Financial Regulator.

ENDORSEMENTS TO CERTIFICATE NUMBER: CLC*5065

Assured's Name: T J Lennon and Lennon Quarries Ltd

OPERATIVE DATE: 05 JUL 2008

MASTER CONTRACT NUMBER: EGI

SPECIAL ENDORSEMENT NUMBER: L102

It is a condition precedent to liability that all sub-contractors engaged by you hold Employers Liability and Public Liability policies providing:-

- a) Employers Liability indemnity limit of not less than E13,000,000 any one occurrence
- b) Public Liability indemnity limit of not less than E6,500,000 any one occurrence
- c) An indemnity to you as principal

SPECIAL ENDORSEMENT NUMBER: L103

This policy excludes all liability arising from the storage of explosives.

SPECIAL ENDORSEMENT NUMBER: L104

T) indemnities provided under the Certificate including any Extensions or Endorsements will not apply to or include liability arising from damage to crops or land from the Assured's Grolime or similar products.

SPECIAL ENDORSEMENT NUMBER: L105

This policy excludes all liability arising from waste disposal

SPECIAL ENDORSEMENT NUMBER: L106

It is a condition precedent to liability that this policy excludes horizontal/vertical blasting where they are undertaken simultaneously

SPECIAL ENDORSEMENT NUMBER: L107

It is a warranty of this insurance that all explosive works are to be carried out by Irish Industrial Explosives and that this Company is insured for limits of indemnity not less than hereon with a specific indemnity to the Assured

SPECIAL ENDORSEMENT NUMBER: L108

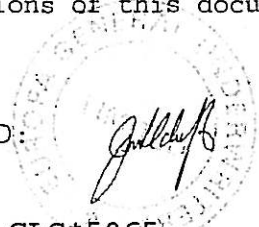
It is understood and agreed that General Exclusion 7) on page 10 of the policy is amended to read as follows :

- 7) any liability of whatsoever nature arising out of
 - a) any work of demolition unless the Assured's occupation is shown as Building Contractor in the Policy Schedule attaching to this Policy and such work of demolition forms part of a contract undertaken by the Assured for rebuilding alteration maintenance or repair
 - b) piledriving or the use of explosives
 - c) sub aqua work or water diversion
 - d) the construction alteration or repair of towers steeples chimney shafts blast furnaces viaducts bridges docks tunnels dams canals piers or wharves

Subject to the Terms Exclusions and Conditions of this document

DATE: 23 OCT 2008

SIGNED:

A circular stamp is visible, partially overlapping the signature. The text within the stamp is mostly illegible but appears to contain the name of the company or a related entity.

ENDORSEMENTS TO CERTIFICATE NUMBER: CLC*5065

Assured's Name: T J Lennon and Lennon Quarries Ltd

OPERATIVE DATE: 05 JUL 2008

MASTER CONTRACT NUMBER: EGI

SPECIAL ENDORSEMENT NUMBER: L95

The indemnity provided under this Policy including any extensions or endorsements will not apply to or include liability arising from :

1. the cost of digging out and removing/replacing any cement or concrete supplied by the Assured
2. any claim for rebuilding cost including any loss or expenses consequent upon rebuilding which is due to the failure of cement or concrete to fulfil the purpose for which it was supplied

Subject to the Terms Exclusions and Conditions of this document

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DATE: 23 OCT 2008

SIGNED:



ATTACHMENT K

Remediation, Decommissioning, Restoration and Aftercare

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ATTACHMENT K

Remediation, Decommissioning, Restoration and Aftercare

The 'Method of Material Recovery' for the facility subject to this Waste Licence Application, is discussed in Section H.1 above. This application proposes to raise the level of the site by 2m, by spreading out the accepted inert materials (construction & demolition waste and wastes resulting from quarrying activities) (24,900 Tonnes/Annum) over the surface of the 'Area of Deposition'. Drawing No. 2084-2607 (Attached in 'Application Drawings', Tab 15) presents the 'Existing Topographic Map of Application Site' (i.e. before proposed 'Land Raise' by 2m) and Drawing No. 2084-2608 - (Attached in 'Application Drawings', Tab 15), shows the 'Proposed Topographic Map of Application Site, Showing Final Ground Levels' (i.e. with proposed 2m Land Raise shown). Cross Section Locations A-A, B-B, C-C, D-D & E-E are shown on Drawing 2084-2607 & Drawing No. 2084-2608 (Attached in 'Application Drawings', Tab 15), with the Cross Sections presented on Drawing No. 2084-2609, Drawing No. 2084-2610 & Drawing No. 2084-2611 (Attached in 'Application Drawings', Tab 15). The Cross Sections clearly show the Land Raise by 2m, with a slope of 3:1 down to all existing perimeter surface water drains, which will remain untouched. The existing open surface water drains that cut through the Area of Waste Deposition, will also be raised by 2m, as shown on the Cross Section Drawings.

To allow for a proposed 2m Land Raise, it was calculated that a total of 373,039m³ of material would have to be accepted/recovered at the facility. Using a density for Construction & Demolition Waste & Wastes from Quarrying Activities of 1.6 Tonnes/m³, it was calculated that 596,862.5 Tonnes of inert waste would have to be accepted at the facility for recovery/reclamation. Based on an annual intake of 24,900 Tonnes/Annum, it is calculated that the facility will be active for 24 Years (i.e. 2009 - 2032).

As discussed previously, there is presently an active Mayo County Council Waste Permit for the facility (PER 144), which allows recovery/reclamation of 24,900 Tonnes/Annum of construction & demolition waste at the site since 2006. The materials deposited under this Waste Permit (ca. 25,000 Tonnes) inside the main entrance gate to the facility, are partially covered with natural vegetation. These areas became vegetated naturally (i.e. they were not planted). This suggests that once material deposition is completed on sections of the facility (under the proposed Waste Licence), that natural revegetation

should occur. This process can be helped along by the scattering of grass seed over sections of site, once deposition in that section is complete.

Once Material Recovery/Reclamation is complete at the facility, the site accommodation (Portocabin & Portoloo) will be removed from the site, the Waste Quarantine area will be demolished, and the materials recovered.

The site surface water drainage system (including 5 no. Settlement Ponds) will remain untouched, following facility closure. This will allow the surface water continue to be treated for suspended solids long after the facility has stopped accepting material for recovery/reclamation.

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ATTACHMENT L.1

Section 40(4) WMA

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ATTACHMENT L.1

Section 40(4) WMA

We feel that the requirements of Section 40(4)[(a) to (i)] of the Waste Management Acts 1996 to 2003, have been met in this Waste Licence Application, and will continue to be met should the facility subject to this Waste Licence Application continue to operate under an EPA Waste Licence.

Each of the requirements of Section 40(4)[(a) to (i)] of the Waste Management Acts 1996 to 2003, will be dealt with below.

Section 40 - Grant of Waste Licence -

(4) The Agency shall not grant a waste licence unless it is satisfied that:

(a) Any emission from the recovery or disposal activity in question ("the activity concerned") will not result in the contravention of any relevant standard, including any standard for an environmental medium, or any relevant emission limit value, prescribed under any other enactment.

Section E of this application form investigates all emissions (existing and proposed) from the facility subject to this Waste Licence Application. It confirms that there are/will be no emissions to sewer or groundwater, that the only noise emission from the site will be the one piece of mobile plant (Hitachi 200 excavator), that there will be 5 no. surface water emissions from site drainage to the Clooneen River and 1 no. surface water emission from the proposed petrol interceptor to the site surface water system, that the only emissions to atmosphere will be from the exhaust of the mobile plant and haulage trucks arriving/departing the site, and of dust from the unloading, stockpiling and movement of the inert waste for recovery, around the site.

Section E, Section F.1 and Section I ('Mitigation Measures') discuss the 'Treatment, Abatement and Control Systems' to be put in place to ensure the above listed emissions from the facility will not result in the contravention of any environmental standard. These measures include: construction of 5 no. Settlement Ponds on all drainage channels prior to their discharge from the site, the installation of a petrol interceptor, the regular servicing of facility plant to

ensure that noise and exhaust emissions are kept to a minimum, and the use of a tractor with water bowser to dampen down dust from the facility during periods of extended dry weather.

(b) The activity concerned, carried on in accordance with such conditions as may be attached to the licence, will not cause environmental pollution.

Lennon Quarries Ltd. (Applicant) is presently operating on the facility subject to this Waste Licence, under Mayo County Council Waste Permit PER 144, which was granted in January 2006. They have received no complaints of non-compliance from Mayo County Council in that time. They are determined to operate the facility in full compliance with the EPA Waste Licence, should it be granted.

(bb) If the activity concerned involves the landfill of waste, the activity, carried on in accordance with such conditions as may be attached to the licence will comply with Council Directive 1999/31/EC on the Landfill of Waste.

This sub-section is Not Applicable as this Waste Licence Application does not involve the landfill of waste. It applies for 'Recovery' activities only.

(c) The best available technology not entailing excessive costs will be used to prevent or eliminate or, where that is not practicable, to limit, abate or reduce an emission from the activity concerned.

The activities proposed in this Waste Licence Application follow a simple process (i.e.: the acceptance of inert material (construction & demolition waste and waste resulting from quarrying activities) and the spreading of this material over the deposition site to a depth of 2m, with slopes of 3:1 to the existing perimeter site drains). It does not involve the use of complicated technology.

The best available technology, not entailing excessive costs will be used in the development of the 'Treatment, Abatement and Control Systems' discussed above, to limit, abate or reduce emissions from the facility.

(cc) The activity concerned is consistent with the objectives of the relevant waste management plan or the hazardous waste management plan, as the case may be, and will not prejudice

measures taken or to be taken by the relevant local authority or authorities for the purpose of the implementation of any such plan.

No Hazardous material is proposed to be accepted at the facility, therefore, the Hazardous Waste Management Plan is not relevant to this application.

The activity concerned is consistent with the objectives of 'Mayo County Development Plan 2008 - 2014', in providing a much needed Material Recovery Facility to County Mayo, that will not have a negative effect on the environment or the landscape of the area.

(d) If the applicant is not a local authority, the corporation of a borough that is not a county borough, or the council of an urban district, subject to subsection (8), he or she is a fit and proper person to hold a waste licence.

This sub-section will be dealt with in Section L.2/Attachment L.2 of the Waste Licence Application below.

(e) The applicant has complied with any requirements under Section 53,

This sub-section (relating to 'Financial Provisions') will be dealt with in Section L.2/Attachment L.2 of the Waste Licence Application below.

(f) Energy will be used efficiently in the carrying on of the activity concerned.

Energy Efficiency at the facility subject to this Waste Licence Application, is dealt with in Section G.2/Attachment G.2 of this Waste Licence Application.

It concludes that the only 'Energy' proposed to be used at the facility will be that to run the Facility Plant (Hitachi 200 excavator) and the Generator (to provide electricity to the site Portocabin). To ensure energy efficiency, the facility plant engine will be switched off when not in use and the generator will only be used when absolutely necessary. Based on the above, it is anticipated that the proposed facility will be very energy efficient.

(g) Any noise from the activity concerned will comply with, or will not result in the contravention of, any regulations under Section 106 of the Act of 1992.

A full 'Noise Assessment' was carried out as part of this Waste Licence Application and the Noise Assessment Report attached in Attachment I.6.

The Noise Assessment Report concludes:

"A comprehensive assessment of the potential noise and vibration impacts associated with the waste recovery site has been completed. Site activities will be effectively managed to ensure that all potential noise and vibration impacts are minimised to acceptable levels. There are no significant adverse or unacceptable noise or vibration impacts predicted at local sensitive receptors in the vicinity of the site as a result of the waste recovery facility operating".

(h) Necessary measures will be taken to prevent accidents in the carrying on of the activity concerned and, where an accident occurs, to limit its consequences for the environment

'Accident Prevention & Emergency Response' is dealt with in Section J /Attachment J of this Waste Licence Application.

The main accidents of concern for the facility subject to this Waste Licence Application are an accidental fuel spillage, or a fire at the facility. Necessary measures to be taken to prevent these accidents occurring, and actions to be taken should an accident occur are all presented in Section J/Attachment J.

(i) Necessary measures will be taken upon the permanent cessation of the activity concerned (including such a cessation resulting from the abandonment of the activity) to avoid any risk of environmental pollution and return the site of the activity to a satisfactory state.

'Remediation, Decommissioning, Restoration and Aftercare' measures for the facility subject to this Waste Licence application are presented in Section K/Attachment K of this Waste Licence Application.

Due to the simple process of Material Recovery/Reclamation proposed for the facility, very little remediation or decommissioning will be required. The site is expected to revegetate naturally and abatement measures to ensure surface water leaving the site has a chance to settle (i.e. deposit suspended solids), in the form of 5 no. Settlement Ponds will be left in place following closure of the facility.

ATTACHMENT L.2

Fit and Proper Person

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ATTACHMENT L.2

Fit and Proper Person

The Applicant - Lennon Quarries Ltd. is a 'Fit & Proper Person', complying with all of the requirements of Section 40(7) of the Waste Management Acts 1996 to 2003'

Each of the requirements of Section 40(7) of the Waste Management Acts 1996 to 2003, will be dealt with below.

Section 40 - Grant of Waste Licence -
.....

- (7) For the purpose of this Part, a person shall be regarded as a fit and proper person if -**
- (a) Neither that person nor any other relevant person has been convicted of an offence under this Act prescribed for the purposes of this subsection;**

The applicant (Lennon Quarries Ltd.) or any person working for the applicant, have not been convicted of an offence under the Waste Management Acts 1996 to 2003, the EPA Act 1992 and 2003, the Local Government (Water Pollution) Acts 1977 and 1990 or the Air Pollution Act 1987.

- (b) In the opinion of the Agency, that persons or, as appropriate, any person or persons employed by him or her to direct or control the carrying on of the activity to which the waste licence relate has or have the requisite technical knowledge or qualifications to carry on that activity in accordance with the licence and the other requirements of this Act.**

As stated in Section C.1 above:

'Lennon Quarries Ltd., is a local County Mayo owned/operated company, which provides employment to ca. 25 no. people in the Belmullet area. The company is primarily a quarry/rock aggregate provider, with a large quarry located in Glencastle, Bunnahowen, Ballina, County Mayo.

The company branched out into the Waste Management Area in 2005, when they applied for and received Waste Collection Permit CW276 from Mayo County Council. Lennon Quarries Ltd. have been successfully operating as 'Waste Collectors' of Construction & Demolition Waste in the Mayo County Council region for the last 3.5 no. years, under the conditions of Waste Collection Permit CW276. They have received no letters of warning/complaint from Mayo County Council, under their Waste Collection Permit in that time. An application for the review of this Waste Collection Permit issued to Mayo County Council on 11 December 2008.

Lennon Quarries Ltd. also presently hold a Waste Facility Permit from Mayo County Council for a Material Recovery/Reclamation Facility at Tallagh, Belmullet, Co. Mayo (Ref.: PER 144), the site which is subject to this Waste Licence Application. This permit was granted in January 2006, and is proposed to be replaced by a Waste Licence, subject to this application.

It is to this facility that the waste materials collected under the Lennon Quarries Ltd. Waste Collection Permit (CW276) have been/will be deposited. The Lennon Quarries Ltd. permitted facility has at all times operated within the conditions imposed upon them by Waste Facility Permit PER 144, and have received no letters of warning/complaint from Mayo County Council, under their Waste Facility Permit.

Although Mr. Thomas J. Lennon and his employees (particularly those named in the 'Management Structure') have no direct qualifications in relation Waste Management, all have gained valuable technical knowledge through working in the area for many years, under the Mayo County Council Waste Collection Permit (CW276) and Waste Facility Permit (PER 144), discussed above.

Lennon Quarries Ltd. track record in the Waste Management area (both waste collection and waste recovery/reclamation) indicates that they are a company determined to operate in an organised and efficient manner, in strict compliance with the relevant permits/licences, and at all times ensuring that protection of the environment is foremost in their company practices'.

- (c) ***In the opinion of the Agency, that person is likely to be in a position to meet any financial commitments or liabilities that the Agency reasonably considers will be entered into or incurred by him or her in carrying on the activity to which the waste licence will relate in accordance with the terms thereof or in consequence of ceasing to carry on that activity.***

Lennon Quarries Ltd. are in a position to meet any financial commitments or liabilities that the Agency reasonably considers will be entered into or incurred by him or her in carrying on the activity to which the waste licence will relate in accordance with the terms thereof or in consequence of ceasing to carry on that activity.

A letter confirming the above from Lennon Quarries Ltd. bank is attached overleaf.

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Belmullet, Ballina
 Co. Mayo
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 Fax +353 (0)97 81052
 www.bankofireland.ie

Waste Licensing Section,
 Office of Climate, Licensing & Resource Use,
 ENVIRONMENTAL PROTECTION AGENCY,
 PO Box 3000,
 Johnstown Castle Estate,
 County Wexford

20 January 2009

**RE: Waste Licence Application, Lennon Quarries Ltd.
 for a Material Recovery Facility, Tallagh, Belmullet, Co. Mayo**

To Whom it may Concern,

It is my opinion that the applicant is likely to be in a position to meet any financial commitments or liabilities that may have been or will be entered into or incurred in carrying on the activity to which the Waste Licence Application relates, or in consequence of ceasing to carry out that activity.

Signature:

Name (Block Capitals):

CHRIS CLAMPEST

Financial Institution:

BANK OF IRELAND

Date:

20/1/09

Official Stamp:

