BORD NA MÓNA

BORD NA MÓNA ENVIRONMENTAL LIMITED

F.A.O. Ms. Una O' Callaghan
EPA
Regional Inspectorate,
Inniscara,
Co. Cork.
30/06/09

Re: W0253-01 Clean (Irl) Refuse & Recycling Ltd.
Notice in accordance with Article 14(2) (b) (ii) of the
Waste Management (Licensing) Regulations

Dear Una,

Following out meeting in Inniscara on 3rd June, I wish to submit the part response to your letter on Article 12 & 13 Compliance Requirements. Due to the proposed amendment to the WL application and associated EIS, several of the items in the letter cannot be addressed at this time and will be fully addressed in a the subsequent submission of amended EIS & WL Application.

I have therefore addressed the items which can be addressed for your attention. These items have had no impact of the non-technical summary of the application or the EIS.

I have submitted 3 no. hardcopies of the drawings/attachment noted in the accompanying response and 3 no. CD-ROM's. I understand 16 no. copies are required however this is a part-response and the CD's only contain 4 files in total. If you wish me to burn another 13 CD's I will meet that requirement.

The current status of the Clean (Irl) Refuse & Recycling Ltd. is the stage where the AD process is being finalised and the EIS and WL Application will be amended as agreed with the Agency.

Please don't hesitate in contacting me.

Yours Sincerely,

Ms. Helen Behan

Environmental Consultant
Technical Services
Bord na Mona Plc
Main Street,
Newbridge,
Co. Kildare.

045 439376

ARTICLE 12 Compliance Requirements

Item	Article 12 Compliance Requirements	Details	Comments
1	Update Table E.1(ii)	Main emission to atmosphere for the one biofilter emission A2-1	Details shall be provided on amendment to Waste Licence Application& EIS
	Update Table E.1(ii)	Main emission to atmosphere for Biomass Recovery plant A2-2	Details shall be provided on amendment to Waste Licence Application& EIS
	Update Table E.1(iii)	chemical characteristics of emission for biofilter	Details shall be provided on amendment to Waste Licence Application& EIS
	Update Table E.1. (iii)	chemical characteristics of emission for biomass recovery plant	Details shall be provided on amendment to Waste Licence Application& EIS
	Update Table F.1.	Abatement/control of A2-1 biofilter	Details shall be provided on amendment to Waste Licence Application& EIS
	Update Table F.1.	Abatement/control of A2-2 biomass recovery plant	Details shall be provided on amendment to Waste Licence Application& EIS
	Attachment F.2	Monitoring locations of biofilter A2-1	Details shall be provided on amendment to Waste Licence Application& EIS
	Attachment F.2	monitoring locations of biomass recovery plant A2-2	Details shall be provided on amendment to Waste Licence Application& EIS
2	Quantify energy resources	The electricity/ oils/water used on site	See Attachment 1
3	clarify the proposed source and nature of wood for use as a fuel in the Biomass recovery plant'- justify under waste incineration directive	Biomass Recovery Plant	See Attachment 2
4	Provide tech/specs on underground leachate storage tank	Specs required for Biostabilisation Plant	Details shall be provided on amendment to Waste Licence Application& EIS
5	waste generated and accepted on site complete table h.1 (I) and H.1 (ii)	Section H.4 related to waste arising from the site and not 'waste accepted' as per guidance notes	See Attachment 3
6	clarify the class of silt/oil interceptor	Class of interceptor required	See Attachment 4
7	justify the requirement for storage of 60,000l of fuel & clarify the bunding for this portable storage unit	Details & justification required	See Attachment 5

Article 13 Compliance Requirements

Item	Article 13 Compliance Requirements	Details	Work submitted
1	clarify the proposed source and nature of wood for use as a fuel in the Biomass recovery plant'- justify under waste incineration directive	Biomass Recovery Plant	See Attachment 2
2	types of waste to be treated at biostabilisation plant	EIS attachment	See 3 no. hardcopy attached and pdf on CD-rom
3	Submit C(IRL) WL-10	Air emissions	See 3 no. hardcopy attached and pdf on CD-ROM
4	Supply comprehensive details of the end of life vehicles depollution process to be carried out on site.	Extra depollution information required	See Attachment 6
	Supply details of the source of the treatment of the end of life vehicles on site and the destination of the depollluted parts' &	Extra depollution information required	See Attachment 6
5	Noise impacts of the end of life vehicle depollution process have been assesses (air bag deployment)	Crushing process	See Attachment 7
6	Submit C(IRL) WL-06	Noise monitoring locations	See 3 no. hardcopy attached and pdf on CD-ROM
7	submit appendix 1	Typo relating to noise location	This was a typo and there is no reference for this 'appendix 1'
8	Submit C(IRL) WL-25	noise locations	See 3 no. hardcopy attached and pdf on CD-ROM
9	clarify the class of silt/oil interceptor	Class of interceptor required	See Attachment 4

Attachment 1

The energy resources at the facility may be detailed as follows:

1. Engine Oil 13,671 litres /annum
2. Hydraulic Oil 2,300 litres /annum
3. Motor Diesel 525,000 litres/annum
4. Green Diesel 144,000 litres/annum
5. ESB 42,107 kW/h per annum

Attachment 2

The inclusion of a Biomass Recovery Plant for virgin wood is currently under consideration with Clean (Irl) Refuse & Recycling.

Attachment 3

This relates to Section H.4. However, H.4 does not mention waste 'accepted on site'. All waste generated on site has been disclosed in tables H.1 (i) and H.1 (ii) in application made 22/12/08. Can you expand on your request in the letter?

' with regard to waste generated and accepted on-site, provide information on the quantity in tonnes produced and the reuse, recovery, and/or disposal routes of each waste stream proposed, complete table H.1 (i) and H.1 (ii)'

Attachment H.1 contains all the hazardous waste **generated** on site. The other waste which would include office and canteen waste is handled on site and disposed/recovered etc. as part of the waste activities at Clean (Irl) Refuse & Recycling Ltd.

The 2005 guidance notes are as follows:

H.4 Waste Arisings

Complete only as relevant, for facilities where there is any waste produced on the premises, e.g. contaminated soil applications. The Waste Management Acts 1996 to 2003 (Second Schedule, Part III) and the EU Commission Decision (2000/532/EC, Article 2) established a list of wastes and specified fourteen properties of waste which might render it hazardous. These properties all need to be examined in the case of contaminated land remediation to determine if the contaminated soils or groundwater are to be regarded as hazardous or non-hazardous waste. Furthermore the EPA assessment procedure for determining if waste is hazardous should also be carried out, as detailed in the 'Procedure for Identification of the Hazardous Components of Waste.

Details of all waste materials generated on the site including, name, description and nature as well as On-site Recovery/Disposal aspects should be identified. The quantities of each type of waste generated on an annual/monthly basis should be calculated and stated in Tables H.1(i) and H. 1(ii) of the application form. Applicants should also provide conversion factors used to relate volume (m^3) and tonnage (t) for their waste stream.

All waste material should be evaluated for possible reuse, recovery or recycling and the results of such evaluations should be submitted.

Waste disposal arrangements

In the case of waste disposed off-site, an indication of transport off site and destination should be provided. However, this aspect is normally better dealt with during the enforcement of the licence.

Attachment 4

There are two soil interceptors at the Clean (Irl) Refuse & Recycling facility Ltd. One located at the north of the site (CP2600) and one located at the south of the site (CP300). Both are Class 1 interceptors as the surface water discharges to a watercourse.

Attachment 5

Bunded Fuel Storage

Clean Ireland Recycling plans to introduce diesel fuel storage of up to 60000lts.
The fuel tank and bund will be stored over ground.

Bund specification as follows:
Bund constructed from:
5mm ST37/2 steel plate
Bottom bearers 200x140x46kgs/m UB
Top reinforcing 100x100x5mm RHS
All joints both inside and out fully seam welded with min 8mm fillet welds
Roof fitted above tank to be from single skin cladding with appropriate gutters and down-pipes for rain water.

Finish:
Corrosivity Category C4
Bund to be shot-blasted to SA 2.5 ISO 8501-1 standard prior to painting.
Undercoat - 3 coats of two pack zinc rich primer @ 80 microns
Intermediate coat - 2 coats of two pack epoxy intermediate primer @ 160 microns
Top Coat - 2 coats of two pack polyurethane top coat colour @ 60 microns

When the tank/bund is installed and prior to filling with fuel, the bund will be independently tested and certified on site in accordance with The Control of Pollution (Oil Storage) Regulations 2001 by Chemstore Ltd, Clondrinagh Industrial Estate, Ennis Rd, Limerick. Tank and bund to be re-tested and certified on an on-going basis in accordance with current regulations.

The proposed diesel fuel storage 60,000 litres and bund is for the existing fleet of trucks based in the Cree depot. There will be no extra trucks refuelling here. The current fuel storage capacity is not sufficient. At present Clean Ireland Recycling needs to re-fill its fuel storage tanks approx three times a week. The proposed increase is to reduce fuel deliveries to the site.

Attachment 6

The ELV Depollution Process

In order to de-pollute an ELV and classify it as non-hazardous, a number of operations have to be conducted. This de-pollution process should take between 20 – 30 minutes.

Prior to de-pollution process, vehicle to be stored on the concrete area within the catchment area of the interceptor tank.

Depollution Sequence

1. Remove battery
2. Remove fuel filler cap and oil filler cap
3. Set heater to maximum
4. Remove wheels and separate lead balance weights

Put vehicle onto support frame

5. Drain engine oil and remove oil filter
6. Drain transmission oil, including rear differential if applicable
7. De-gas air conditioning unit (if fitted)
8. Drain coolant
9. Drain brake fluid
10. Remove catalyst (if fitted)
11. Drain washer bottle
12. Drain brake / clutch reservoir
13. Drain power steering reservoir (if fitted)
14. Drain fuel tank
15. Drain shock absorbers or remove suspension fluid
16. Replace drain plugs / fit plastic stoppers

Remove vehicle from support frame

17. Remove air bags (if fitted, and can not be deployed in-situ)
18. Deploy airbags in-situ (if fitted and able to conduct this
19. operation)

When all of the depollution activities described above have been conducted, the ELV is classified as non-hazardous waste. The ELV can then be recycled.

All fluids and other items which have been removed (apart from any air bags which have been deployed) will still be classified as hazardous waste. These will be stored in suitable storage facilities, which meet all regulations, until they are either treated or sent for recycling or disposal through a suitably licensed waste management contractor.

A system for recording the quantity of fluids and other items which have been removed will be developed. The information which is recorded will enable regular reports to be provided to waste regulators.

Storage of Hazardous materials prior to removal from site

Prior to removal from site all fluids removed during the de-pollution process will be stored inside in sealed containers in an appropriately bunded area.
In the interest of fire safety batteries will be stored separately in the specified plastic sealed containers as supplied by the battery recycling company.

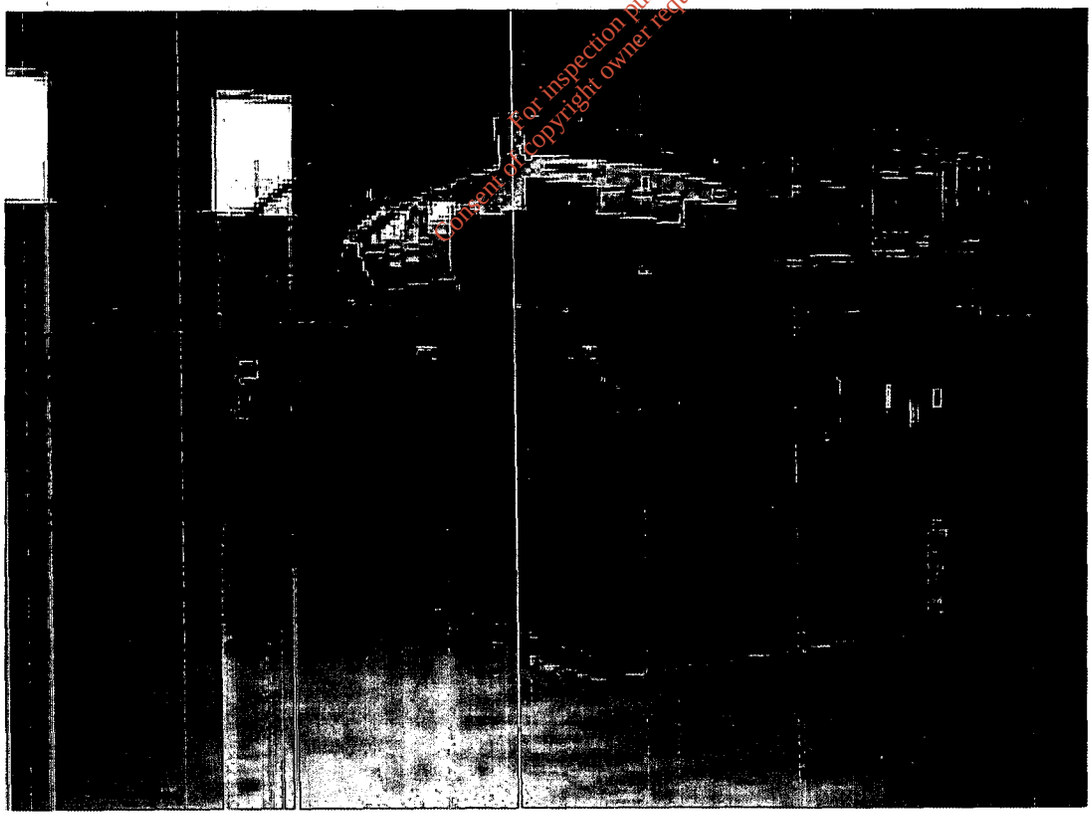
Regular removal of the above mentioned materials from site to the appropriate licensed waste management companies will be insured. This will be to eliminate excessive quantities of any hazardous material being stored.

Destination for materials removed during de-pollution process.

Batteries:	Battery Recycling Co. Thurles, Co Tipperary
Lead balancing weights:	Galway Metal Co., Galway
Tyres:	Buckley Waste Disposal, Listowel, Co. Kerry
All Fluids including Oils, fuels, hydraulic fluids, Screen washes, etc	Enva Ireland Ltd.,

Full details regarding quantities, weights, etc of all material types to be recorded and available for inspection at all times.

Example of De-pollution rig:



Attachment 7

Noise levels associated with de-pollution process.

The only main elevated noise level associated with the ELV de-pollution process is the air-bag deployment. Air-bag deployment can in some cases reach a momentary noise level of up to 150dB
The equipment used for detonating air bags enable the operator of the equipment to be a minimum of 20 metres from the air bag when it is deployed. Suitable procedures which ensure that no other person will be within 20 metres of the airbag when it is deployed will be followed.

Crushing or baling of the de-polluted ELVs will occur on site. This process involves placing the ELV into a vehicle baler. The baler chamber is closed and then crushing begins. The noise levels associated with vehicle baling will never exceed 80dB. The crushing occurs inside a closed chamber so this helps to keep noise levels to a minimum. As an extension of normal safety procedures the baler operator and any other personnel within 20 metres of the baling process will be required to wear ear protection as a precaution.

As experienced ELV recyclers, Galway Metal Co. can be contacted as a reference for this type of procedure.