

**This Report has been cleared
for submission to the Board by
the Programme Manager P. Nolan
Signed: N. Kearey Date: 06/03/08.**



**LICENSING & RESOURCE
USE**

INSPECTOR'S REPORT ON A LICENCE APPLICATION

To:	Directors	
From:	Emer Cooney	- Licensing Unit
Date:	6 th March 2008	
RE:	Application for a Waste Licence from Tonge Industries Limited, Unit 7, First Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24, Licence Register W0239-01.	

Type of facility:	Transformer recovery facility
Classes of Activity (P = principal activity):	4 th Schedule: 3 (P), 8
Quantity of waste managed per annum:	625 tonnes metal 510 tonnes oil
Classes of Waste:	Hazardous (oil) and non-hazardous (metal)
Location of facility:	Unit 7, First Avenue Cookstown Industrial Estate Tallaght Dublin 24
Licence application received:	1 st October 2007
Third Party submissions:	1
EIS Required:	No
Article 14 Notices sent:	17 th December 2007
Article 14 compliance date:	28 th January 2008
Article 16 Notices sent:	17 December 2007
Article 16 Compliance date:	28 th January 2008
Site Inspection:	26 th November 2007
Site Notice Inspection:	24 th October 2007

1. Facility

Tonge Industries Limited (TIL) has applied for a waste licence for its transformer recovery facility at Cookstown Industrial Estate, Tallaght, Dublin 24. TIL has been recycling and decommissioning ESB transformers since the 1960s. TIL has been operating at this site since

May 2000. There are four employees at the facility and operating hours are 08:00 – 16:00 Monday to Thursday and 08:00 – 15:00 on Fridays.

2. Operational Description

Transformers are delivered to TIL by the ESB. They are inspected and segregated into those for repair and those for decommissioning. No transformers are rejected, therefore there is no quarantine area. Leaking transformers are transported by the ESB in bags and are stored on bunded trays at the facility. Transformers for decommissioning are cut open and dismantled using air tools. The insulating oil is sucked to a 13,000 litre holding tank. The transformer coils, and any metal with oily residue, are allowed to drain to a sump inside the building. Oil from the sump is also drained to the holding tank. Metals are stored in a skip and boxes. The oil and metals are sent off-site for recovery at licensed facilities. There are no emissions from the process. All activities take place inside the facility building. The oil storage tank and metal skip are located outside the building.

3. Use of Resources

Fuel: Used for forklifts only.
Electricity: 10,000 kWh per annum.

4. Emissions

There are no emissions to air, sewer, surface water, ground or groundwater from the facility.

Storm Water Runoff

Surface water run-off from yard areas and the roof is discharged via a full retention oil interceptor to a local authority surface water sewer. The oil storage tank is bunded, however, there is an outlet valve at the base of the bund. Condition 3.4.5 of the Recommended Decision (RD) requires the licensee to install a lock on the valve within one month of the date of grant of the licence in order to prevent accidental opening of the valve.

Wastes Generated

Apart from the transformer metals and oils, no other significant wastes are generated at the facility.

Noise

The applicant has submitted details of a noise survey carried out at the boundary of the facility. Noise levels of 58.2 – 59.9 dBA L_{eq} were recorded. This facility is located in an industrial area and the main source of noise in the area is traffic. The main sources of noise at the facility are the air tools used for dismantling the transformers (located inside the building), the air compressors (located inside the building) and the noise from movement of metals into the skip (located outdoors). Condition 6.10 of the RD requires an annual noise survey to be carried out to demonstrate compliance with the limits specified in Schedule B.4.

5. Cultural Heritage, Habitats & Protected Species

The site is not covered by any designation for conservation. The proposed facility is located in an industrial area of Dublin.

6. Best Available Techniques (BAT)

I have examined and assessed the application documentation and I am satisfied that the site, technologies and techniques specified in the application and as confirmed, modified or specified in the attached Recommended Decision comply with the requirements and principles of BAT. I consider the technologies and techniques as described in the application, in this report, and in the RD, to be the most effective in achieving a high general level of protection of the environment having regard - as may be relevant - to the way the facility is located, designed, built, managed, maintained, operated and decommissioned.

7. Fit & Proper Person Assessment

The legal, technical and financial standing of the applicant qualifies them to be considered Fit and Proper Persons.

8. Submission

There was one submission made in relation to this application, from Mr. Shay Kelly of Trademet, which is located in the unit adjacent to TIL. The concerns raised by Mr. Kelly are as follows:

- A strong odour of paint/thinners regularly permeates the area.
- A dangerous vapour is being released into the air.
- Trademet is concerned for the health of its employees.

Response:

Spray painting and pyrolysis were formerly carried out at the facility. However, the spray unit and the pyrolysis oven were both decommissioned in January 2007 and such activities are no longer carried out and no vapours are released into the atmosphere.

- TIL regularly dismantle and cut up metal, which releases a cloud of smoke, following which the yard is washed down with a high pressure hose.
- What is happening to the residue that appears to be washed down into the drains.

Response:

All metal cutting takes place indoors. No process activities take place outdoors, therefore any cleaning of the yard should not result in any emissions of significance to the surface water drainage system. All yard run-off is required to pass through an interceptor before leaving the site. Condition 8.1 of the RD requires that all waste processing activities take place inside the facility building.

- There appears to be a loud noise continuously being emitted when material is being dumped into a skip.

Response: Noise occurs when metal is transferred from the indoor containers to the outdoor skip, however such noise is intermittent. All other noise sources are located indoors.

9. Charges

The proposed charge for this facility, based on the predicted enforcement effort, is €6,150. This charge has been agreed with the Office of Environmental Enforcement.

10. Recommendation

I have considered all the documentation submitted in relation to this application and recommend that the Agency grant a licence subject to the conditions set out in the attached RD and for the reasons as drafted.

Signed


Emer Cooney

Procedural Note

In the event that no objections are received to the Proposed Decision on the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996-2007.

23.10.2007

Attention of: Emer Cooney.

Licensing Administration,
Office of Climate, Licensing and Resource Use
Environmental Protection Agency
P.O. Box 3000
Johnstown Castle Estate
Co. Wexford.

Re: Ref. No: WO239-01.

We would like to lodge a submission regarding clarification of the following application for a Waste Licence from Tonge Industries reference no. WO239.01

According to the waste licence application form there are no emissions released into the atmosphere, this is untrue as there is a strong aroma of paint/thinners which regularly permeates the area at different times.

Also, they regularly dismantle and cut up metal which releases a cloud of smoke... following on from that they then wash down the yard with a high pressure hose. Our concerns are:

- 1/ That there is a dangerous vapour being released into the atmosphere.
- 2/ What has been happening to the residue which appears to be being washed down the communal drains with the high pressure hoses.
- 3/ We are extremely concerned for the health of our employees.
- 4/ There appears to be a loud noise continuously being emitted when they are dumping material into a skip

Can you please revert as soon as possible.

Yours sincerely,


Shay Kelly,
Health & Safety Manager.



