BORD NA MÓNA

BORD NA MÓNA ENVIRONMENTAL LIMITED

F.A.O. Ms. Una O' Callaghan
EPA
Regional Inspectorate,
Inniscara,
Co. Cork.
20/05/10

Re: W0253-01 Clean (Irl) Refuse & Recycling Ltd.
Further Information Request

Dear Una,

Please find enclosed the information that you verbally requested to support the WL application. I have included 1 no. original and 2 no. copies of all in hardcopy. Should you need a CD-ROM with the AutoCAD drawings and SOPs I will provide on request.

The items were:

1. Extra detail on proposal to meet typical condition of EoLV operations
   Response: Drawings indicating floor plan of engineering workshop C(IRL)WL-34a and elevations C(IRL)WL-34b and SOP CIR 20-133 Rev 01 outlining the End of Life vehicle process are included.

2. RDF material
   The storage of RDF at the facility has been re-assessed following this request for further information. Once the MSW is mechanically separated where organic fines and non-recyclable material are removed, the RDF will be baled and wrapped in plastic. In total, 1,008 bales (c.840 tonnes) will be stored **indoors** between these locations.

   RDF will be stored indoors at two locations at the site:

   - Adjacent to the mechanical sorting line in the designated section of the proposed Biostabilisation Building
   - In the current waste drop down area (as this activity will be moved to the proposed location)

   RDF will be transported in 24 tonne containers (28 bales of compacted and wrapped waste at a weight of 1.2tonnes per bale) to a proposed warehouse in Foynes Port where it will reside until a shipment (2,500 tonnes/c.3,000 bales) is taken to overseas to a designated waste broker. It is anticipated that over a four week period 1,000 tonnes of RDF will be move from the Creegh site to the temporary storage facility at a leased depot in an industrial estate in Foynes awaiting shipment. This accounts for 42 traffic moments by a contracted haulage company to the site for collection of the bales, which will result in and average of two picks up per day, thereby not significantly increasing the traffic to site.

   Location of designated storage areas of RDF material to be indicated on site layout Drawing attached C(IRL)WL-30



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**Directors:** R Scanlan (Chairman), P Bennett, P Fox, C Ó Gógáin

3. Existing site layout indicating structures, activities, processes and monitoring locations are shown on Drawing as attached C(IRL)WL-32.

4. Extra detail on leachate tanks in Biostabilisation building
   Please find attached SOP CIR20-129 Rev 02 detailing the Leachate Management Plan for the Biostabilisation Plant and also attached a drainage map. Please note that in the original application the consultant included leachate tank no. 1 and no. 2 for MBT and MSW which was intended for recycling. The modification now includes on leachate tank (which will not be recycled in the organic waste due to animal by-products legislation. The contents of this leachate no. 1 tank will now have to be tankered off site for treatment. The impetus for this modification is to allow two percolate tanks no. 1 and no. 2 for the inoculation of both waste streams of organic and MSW.

Should you require any further information please don't hesitate to contact me.



Yours Sincerely,

Ms. Helen Behan

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Technical Services
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Co. Clare

Tel: (065) 9059092
Email: cleanirl@iol.ie
Web: www.cleanirl.com



[redacted]

## Purpose

[redacted]

## Scope

[redacted]

## Reason For Issue

[redacted]

## Responsibility

[redacted]

## Introduction

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 per vehicle. All activities will be conducted in accordance with the Second Schedule 'Minimum Technical Requirements for Appropriate Treatment and recovery of End-Of-Life Vehicles in Accordance with Articles 14 and 15' of S.I. Waste Management (ELV) Regulations 2006.

## Procedure

1. Storage of Vehicles Prior to processing

   Unprocessed vehicles will be stored/stacked at a designated impermeable hardstanded area at the facility which will be provided by spillage collection facilities/spillage kits, and all surface water from this area will pass through the oil/silt bypass separator at the south of the facility prior to discharge to the drainage ditch. Routine visual inspection of this storage area will be carried out and recorded.

2. Depollution Shed

   The depollution process will take place in a purpose built depollution shed; an independent location at the west boundary of the site, opposite the trommel. The concrete floor in the shed will be impermeable and there will be bunding/collection systems for collecting any fluids that come in contact with the floor. This will ensure that any liquid run-off is controlled and collected for storage in an impermeable containment sump. The shed will be fitted with appropriate storage facilities for dismantled spare parts, including impermeable storage for oil-contaminated spare parts, containers for batteries, filters, and PCB/PCT containing condensers. Spill kits will be placed at critical locations in the shed. There will be sills put in place at the entrance and egress of the depollution shed to provide bund containment to the depollution working area.

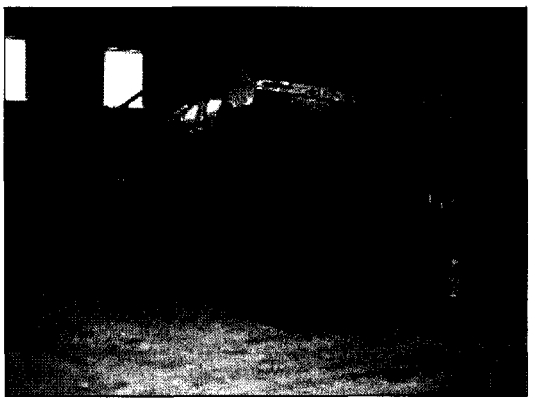
3. Depollution Sequence at Floor Level

   The vehicle to be processed will be transferred indoors into the depollution shed and followed by:

   4.1) Removal of battery
   4.2) Removal of fuel filler cap and oil filler cap
   4.3) Heater set to maximum
   4.4) Remove wheels and separate lead balance weights

4. Depollution Sequence on Support Frame

   The Vehicle will be raised on a support frame (hydraulic rig; see image below)



4.1) Drain engine oil and remove oil filter
4.2) Drain transmission oil, including rear differential if applicable
4.3) De-gas air conditioning unit (if fitted)
4.4) Drain coolant
4.5) Drain brake fluid
4.6) Remove catalyst (if fitted)
4.7) Drain washer bottle
4.8) Drain brake / clutch reservoir
4.9) Drain power steering reservoir (if fitted)
4.10) Drain fuel tank
4.11) Drain shock absorbers or remove suspension fluid
4.12) Replace drain plugs / fit plastic stoppers



5. Deployment of Airbags at Floor Level
Remove vehicle from support frame to floor level followed by:

4.1) Removal of air bags (if fitted, and can not be deployed in-situ)
4.2) Deploy airbags in-situ in the maintenance workshop(if fitted and able to conduct this operation) 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; ensure no other employees are within 20 metres during deployment.

6. When all of the depollution activities in 3, 4 and 5 have been conducted, the ELV is classified as non-hazardous waste. The ELV can then be recycled.

7. Metal Crushing/Baling

The metal will require crushing and/or baling prior to transfer off site to an approved metal recycling facility.

7.1) 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.

7.2) 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.

8. Storage of Vehicles Prior to processing

Crushed/baled vehicles will be stacked in a designated area on an impermeable hard stand surface until a consignment is removed from the facility. Routine visual inspection will be carried and recorded.

9. Hazardous Materials Generated from Depollution Process

7.1) 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.

7.2) 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.

7.3) Recovered vehicle parts that are a potential source of contamination will be retained indoors only, and all measures will be taken to prevent any rainwater coming in contact with materials that could have a polluting effect on the site surface water.



8. Storage of Hazardous materials prior to removal from site

8.1) 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.

8.2) In the interest of fire safety, batteries will be stored separately in the specified plastic sealed containers as supplied by the battery recycling company.

8.3) 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 are shown in below:

| **Materials** | **Destination** |
|---|---|
| Batteries | Battery Recycling Co. Thurles, Co Tipperary |
| Lead balancing weights | Galway Metal Co., Galway |
| 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., |

9. Record Keeping

Full details regarding quantities, weights and required information of all material types to be recorded on relevant records and available for inspection at all times.

10. Noise Levels Associated with End of Life Vehicle Processing .

*Air Bag Deployment*

It is anticipated that the majority of air bags will have been deployed if the vehicle is post accident. Notwithstanding this, the 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 enables 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. The deployment will be carried out indoors reducing noise emissions.



*Crushing/Baling*

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.

11. Certificate of Destruction

A Certificate of Destruction will be provided for each vehicle processed at the facility in accordance with the Third Schedule of S.I. Waste Management (End of Life Vehicles) Regulations 2006.

12. Site Drainage

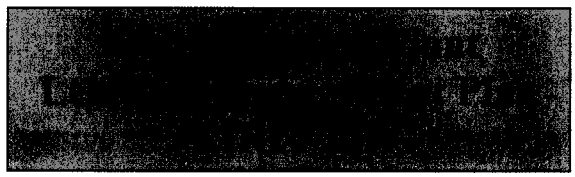
All surface water from the site passes through two silt/oil interceptors at the Clean (Irl) Refuse & Recycling facility Ltd. One located at the north of the site (CP2600) and one located at the south of the site (CP300). Both are Class I interceptors (the surface water discharges to a watercourse) and will be inspected weekly for visual oil stains and odours and cleaned out as required. The relevant interceptor that will be a mitigation measure for the ELV depollution process will be the interceptor at the south of the site.

13. Emergency Response to Oil Spills

Any incidents of spills relating to the processing of ELV will be responded to as per Section 3.0 Emergency Response Procedure CIR20-103.

CIR20 - 129

REV 08



Clean (Irl.)Refuse & Recycling Co. Ltd
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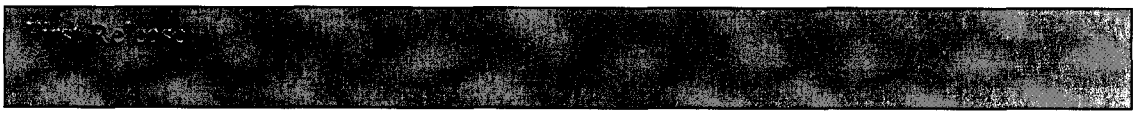
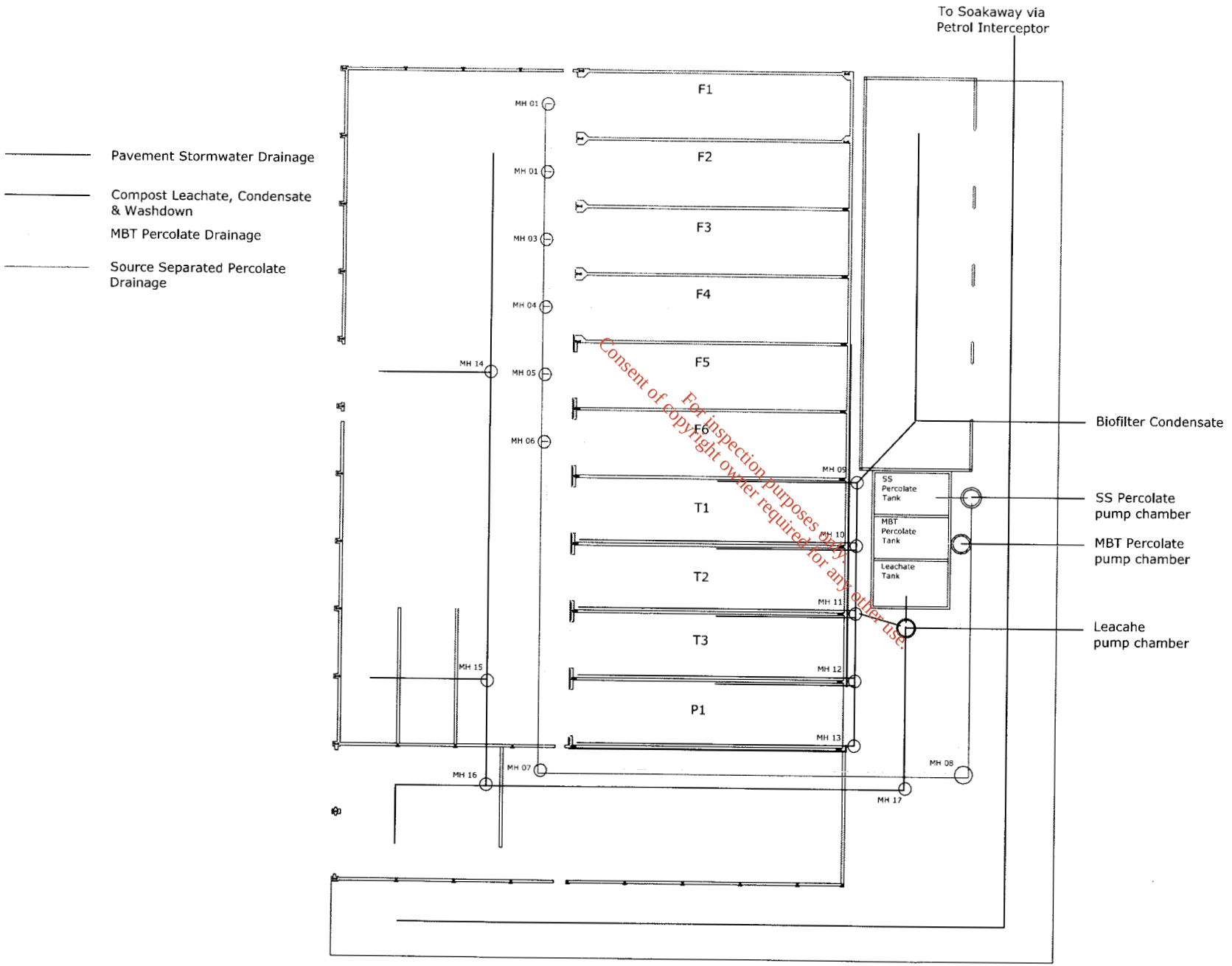
**Purpose**

**Scope**

**Reason For Issue**



**Responsibility**






| REV. | DATE | BY | DESCRIPTION |
|---|---|---|---|
| | | | |

ISSUE FOR: DISCUSSION

Client: CLEAN IRELAND

Project: 15,000T DRY FERMENTATION & COMPOSTING PLANT

Project Reference:

Title of Drawing: Drainage Plan

Prepared by: A.HICKEY | Checked: A.WALSH | Checked:

Project Director: A.WALSH

Plot: CSD | Scales Used: NTS | Paper Size: A1

Drawing No: 04 | Revisions: 1 | Dated: 24/11/09

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