COUNTRYCLEAN
RECYCLING LIMITED

Country Clean Recycling Ltd.,
The Mill Castletownroche, Co.Cork

Tel: 022 46848
Fax: 022 46956
Email: sales@countryclean.ie
Web: www.countryclean.ie

Environmental Licensing Programme,
Office of Climate, Licensing & Resource Use,
EPA Headquarters,
P0 Box 3000,
Johnstown Castle Estate,
Co. Wexford.

23-Nov-11

REF: W0257-01 - Country Clean Recycling Ltd

Re: Notice in accordance Article 14(2(b) (ii) of Waste Management (Licensing) Regulations 2004, as amended.

Dear Sir/Madam,

As requested in your letter dated 11th of Aug 2011, in relation to the waste license application by Country Clean Recycling Ltd (WO257-01), please find enclosed requested information;

1. Revised Table B.7.1 (Third and Fourth Schedules of the Waste Management Act 1996 to 2010) and revised Table H.1 (a). (Quantities of Waste in Relation to Each Class of Activity Applied for).
2. Information regarding how the waste hierarchy in Section 21A of the amended Waste Management Acts 1996 to 2011 is applied.

Please note a non-technical summary has been not been included as the information included herein does not impinge on the non-technical summary.

As requested the information is in the form of one original plus one copy in hardcopy and includes 2 copies of the requested information in electronic searchable PDF format on CD-ROM.

I trust this is satisfactory, if you require any additional information please do not hesitate to contact me.

Yours sincerely

Flor Crowley
Environmental Health Safety Officer
Country Clean Recycling Ltd

TABLE B.7.1 THIRD AND FOURTH SCHEDULES OF THE WASTE MANAGEMENT ACTS 1996 TO 2010

Waste Management Acts 1996 to 2010					
Third Schedule Waste Disposal Operations		Y/N	Fourth Schedule Waste Recovery Operations		Y/N
D 1	Deposit into or on to land (e.g. including landfill, etc.).	N	R 1	Use principally as a fuel or other means to generate energy: This includes incineration facilities dedicated to the processing of municipal solid waste only where their energy efficiency is equal to or above: - 0.60 for installations in operation and permitted in accordance with applicable Community acts before 1 January 2009, - 0.65 for installations permitted after 31 December 2008, using the following formula, applied in accordance with the reference document on Best Available Techniques for Waste Incineration: Energy efficiency = (Ep - (Ef + Ei)/ (0.97x(Ew+Ef) where— 'Ep' means annual energy produced as heat or electricity and is calculated with energy in the form of electricity being multiplied by 2.6 and heat produced for commercial use multiplied by 1.1(GJ/year), 'Ef' means annual energy input to the system from fuels contributing to the production of steam (GJ/year), 'Ew' means annual energy contained in the treated waste calculated using the net calorific value of the waste (GJ/year), 'Ei' means annual energy imported excluding Ew and Bf(GJ/year), '0.97' is a factor accounting for energy losses due to bottom ash and radiation.	N
D 2	Land treatment (e.g. biodegradation of liquid or sludgy discards in soils, etc.).	N	R 2	Solvent reclamation/regeneration.	N
D 3	Deep injection (e.g. injection of pumpable discards into wells, salt domes or naturally occurring repositories, etc.).	N	R 3	Recycling /reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes), which includes gasification and pyrolisis using the components as chemicals.	Y
D 4	Surface impoundment (e.g. placement of liquid or sludgy discards into pits, ponds or lagoons, etc.).	N	R 4	Recycling/reclamation of metals and metal compounds.	Y
D 5	Specially engineered landfill (e.g. placement into lined discrete cells which are capped and isolated from one another and the	N	R 5	Recycling/reclamation of other inorganic materials, which includes soil cleaning resulting in recovery of the soil and recycling of inorganic construction	Y

	environment, etc.).			materials.	
D 6	Release into a water body except seas/oceans.	N	R 6	Regeneration of acids or bases.	N
D 7	Release to seas/oceans including sea-bed insertion.	N	R 7	Recovery of components used for pollution abatement.	N
D 8	Biological treatment not specified elsewhere in this Schedule which results in final compounds or mixtures which are discarded by means of any of the operations numbered D 1 to D 12.	N	R 8	Recovery of components from catalysts.	N
D 9	Physico-chemical treatment not specified elsewhere in this Schedule which results in final compounds or mixtures which are discarded by means of any of the operations numbered D 1 to D 12 (e.g. evaporation, drying, calcinations, etc.).	N	R 9	Oil re-refining or other reuses of oil.	N
D 10	Incineration on land.	N	R 10	Land treatment resulting in benefit to agriculture or ecological improvement.	N
D 11	Incineration at sea (this operation is prohibited by EU legislation and international conventions).	N	R 11	Use of waste obtained from any of the operations numbered R 1 to R 10.	Y
D 12	Permanent storage (e.g. emplacement of containers in a mine, etc).	N	R 12	Exchange of waste for submission to any of the operations numbered R 1 to R 11 (if there is no other R code appropriate, this can include preliminary operations prior to recovery including pre-processing such as, amongst others, dismantling, sorting, crushing, compacting, pelletising, drying, shredding, conditioning, repackaging, separating, blending or mixing prior to submission to any of the operations numbered R1 to R11).	Y
D 13	Blending or mixing prior to submission to any of the operations numbered D 1 to D 12 (if there is no other D code appropriate, this can include preliminary operations prior to disposal including pre-processing such as, amongst others, sorting, crushing, compacting, pelletising, drying, shredding, conditioning or separating prior to submission to any of the operations numbered D1 to D12).	Y	R 13	Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).	Y
D 14	Repackaging prior to submission to any of the operations numbered D 1 to D 13.	Y			
D 15	Storage pending any of the operations numbered D 1 to D 14 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).	Y			

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

Waste Management Acts 1996 to 2010 3rd Schedule (Disposal) Operations			Waste Management Acts 1996 to 2010 4th Schedule (Recovery) Operations		
Class of Activity Applied For		Quantity (tpa)	Class of Activity Applied For		Quantity (tpa)
Class D 1			Class R 1		
Class D 2			Class R 2		
Class D 3			Class R 3	✓	8,000
Class D 4			Class R 4	✓	1,000
Class D 5			Class R 5	✓	14,000
Class D 6			Class R 6		
Class D 7			Class R 7		
Class D 8			Class R 8		
Class D 9			Class R 9		
Class D 10			Class R 10		
Class D 11			Class R 11	✓	1,000
Class D 12			Class R 12	✓	24,000
Class D 13	✓	4,000	Class R 13	✓	48,000 (total of class (Class R3, R4, R5, R11, R12)
Class D 14	✓	24,000			
Class D 15	✓	24,000			

1. Provide Additional Information to address the requirements of article 12(1)(v) of the Waste management (Licensing) Regulations, 2004 as amended in relation to a description of how the hierarchy in section 21a of the amended Waste Managements Acts 1996 to 2011 us applied. Please have regard to the requirements of section 29(2A) of the amended Acts in addressing this item.

Article 12(1) (v) of the said regulations requires an application for a waste license or the review of a waste license to:" *Describe how the waste hierarchy in section 21A of the Act is applied*", the section 21A outlines the waste hierarchy as follows;
The following waste hierarchy shall apply as a priority order in waste prevention and management legislation and policy:
(a) Prevention;
(b) Preparing for re-use;
(c) Recycling;
(d) Other recovery (including energy recovery); and
(e) Disposal.

Having regard to section 29(2A) that states "*It shall be the duty of waste producers and holders to ensure that waste undergoes recovery operations in accordance with sections 21A and 32(1)',* Country Clean Recycling Ltd in compliance with and having regard to the above stated requirements of the Waste Management Acts 1996 to 2011 wishes to outline its compliance as follows;

A) Prevention

'prevention' means measures, taken before a substance, material or product has become waste, that reduce—(a) the quantity of waste, including through the re-use of products or the extension of the lifespan of products; (b) the adverse impacts of the generated waste on the environment and human health, or (c) the content of harmful substances in materials and products;" (Waste Management Act 1996 to 2011)

- Comply with any waste prevention programs implemented by the Agency in accordance with the Waste Management Act 1996 to 2011.
- Make sure customers and haulers drawing waste on site are aware of any waste prevention programs implemented by the agency.
- Include on website advice on waste prevention tips.

Prevention of Waste Generated on Site

- Train staff on the best practices of waste prevention.
- Reduce the use of waste and energy resources in order to prevent waste generation.
- Encourage computer back-up of data and not paper based files when possible.
- Encourage clients to accept electronic invoicing by e-mail rather than paper based.
- Two sided printers for printing internal documents.
- Reuse the blank side of redundant one sided printed documents for internal use rather than throwing them away.

B) Preparing for re-use

'preparing for re-use' means checking, clearing or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing;" (Waste Management Act 1996 to 2011).

- Timber shredded on site is transferred out of the facility for the re-use as either a raw material to make composite pallet blocks or used for animal bedding.
- Country Clean Recycling Ltd has in place Factory Control Procedures for the separate of appropriate C&D waste into reusable aggregates which can be sold to customers as a product.
- Clothes accepted on site are bulk transferred to a suitable facility to be prepared for re-use.
- Where appropriate Country Clean Recycling Ltd engage with companies for the collection of their goods whose products may have ended up in waste streams received on site but are suitable for re-use as follows;
    - Liquefied Petroleum Gas (LP Gas) cylinders received on site within mixed waste streams are separated of the waste streams and delived back to original natural gas provider (*Calor Gas*) for re-use.
    - Appropriate and intact pallets (i.e. *Chep pallets*) received on site within mixed waste streams are segregated out and made available for collection by original manufacturer for re-use.

Country Clean Recycling Ltd will continue to work with and explore opportunities with manufactures and companies where material in waste streams can be separated out and returned for re-use.

C) Recycling

'recycling'—subject to paragraph (b), means any recovery operation by which waste materials are reprocessed into products, materials or substances, whether for the original or other purposes, including the reprocessing of organic material.
(b) does not include—(i) energy recovery, and (ii) the reprocessing into materials that are to be used as fuels or for backfilling operations;(Waste Management Act 1996 to 2011).

In September 2008 Country Clean Recycling invested over a million Euro in a state of the art picking line. Its consist of the following; Finger Screen (250mm), Picking Lines X 2, Magnetic Separator X3, Screen/Trommel(50mm),. Flip Flop Screen (15mm). Blowers & Suckers X 3, Stone Crusher. Details of this picking line are included in in Country Clean Recycling Ltd waste license application. The picking line allows for an increased percent of recyclable material to be removed from C&D and Mixed Waste passed through the line such as i.e. ferrous and non-ferrous metals, plastics, papers, cardboard, batteries, timber, clothes and cables thus reducing waste sent for disposal. As a result of Country Clean Recycling on site operations the following waste types are all sent off site to appropriate waste facilities so they can be recycled or recovered;

- Mixed Dry Recyclables
- Cardboard
- Plastics
- Ferrous & Non Ferrous Metal

- Copper Cable
- Mixed Bottles
- Plate Glass
- Clothes & Textiles
- Batteries
- Plasterboard
- Food Waste
- Timber/Wood

D) Recovery (including energy recovery)

(a) means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfill that function, in the plant or in the wider economy, and (b) without prejudice to the generality of paragraph (a), includes the recovery operations listed in the Fourth Schedule, (Waste Management Act 1996 to 2011).

Country Clean Recycling Ltd sends appropriate recovered Soil and Stone from C&D waste off site as landfill cover, thereby replacing other material which would otherwise have been used to fulfill this particular function.
Before 2011 residual waste from the on site picking line was sent for disposal (landfilled). In 2011 Country Clean Recycling Ltd sourced a facility to send this material off site for recovery as Refuse Derived Fuel/Solid Recovered Fuel, thus diverting over 700 Tonnes away from landfill in 2011.

E) Disposal

disposal'— (*a*) means any operation which is not recovery even where the operation has as a secondary consequence the reclamation of substances or energy, and (*b*) without prejudice to the generality of paragraph (*a*), includes the disposal operations listed in the Third Schedule, *(Waste Management Act 1996 to 2011).*

At present Country Clean Recycling Ltd only sends domestic and commercial mixed municipal waste it receives on site for disposal, as at present this material is unsuitable for treatments further up the waste hierarchy. It is proposed in Country Clean Recycling Ltd waste license application to further treat this waste in the future to remove recyclable fraction such as ferrous and non ferrous metals, organics and plastics thus increasing the amount of waste recycled and reduce the amount of waste to be sent for disposal.

Country Clean Recycling Ltd will continue to explore options to minimize the amount of waste send for disposal and seeks waste removal methods higher up the waste hierarchy.