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Consulting Engineers

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Administration
Environmental Licensing Programme
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency
Headquarters,
PO Box 3000,
Johnstown Castle Estate,
County Wexford

Ref: W0276-01

Dear Sir,

I refer to your recent correspondence in relation to the above application on behalf of DOK
Quarrystone Ltd.

Please find enclosed revised tables B.7.1 and H.1.(A) as per your request.

In relation to paragraph 2 of your request, i.e. the application of the waste hierarchy to the
proposed activities, our response is as follows:

The hierarchy as set out in the relevant legislation is as follows;

- (i) Prevention
- (ii) Re-use / Preparation for re-use
- (iii) Recycling
- (iv) Recovery
- (v) Disposal

The proposed activity is for the recovery of Inert Soil. Recovery being defined by the Waste
Framework Directive by “ ‘recovery’ 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 fulfil that function, in the plant or in the
wider economy.”

Given that the inert soil accepted by the facility comes from construction, and that typically in construction projects inert soil generation is minimised by design or reused within the construction project in order to minimise cost, it is reasonable to infer that 'Recovery' is the highest tier activity that can be reasonably assigned to the process.

I trust that this response adequately addresses the EPA's request and I enclose also a CD with PDF copies of the enclosed response.

Regards,

Muiris O'Súilleabháin B. Eng., M.I.E.I.

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B.7 Type of Waste Activity, Tonnages & Fees

B.7.1 Specify the class or classes of activity in Table B.7.1, in accordance with the Third Schedule or Fourth Schedule to the Waste Management Acts 1996 to 2010, as amended by the European Communities (Waste Directive) Regulations, 2011, to which the application relates (check the relevant box(es) and mark the principal activity with a ‘P’).

Attachment B.7 should identify the principle activity and include a brief technical description of each of the other activities specified. **There can only be one principal activity.**

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.).		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: <ul style="list-style-type: none"> - 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 = $(E_p - (E_f + E_i)) / (0.97 \times (E_w + E_f))$ where— <ul style="list-style-type: none"> ‘E_p’ 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), ‘E_f’ means annual energy input to the system from fuels contributing to the production of steam (GJ/year), ‘E_w’ means annual energy contained in the treated waste calculated using the net calorific value of the waste (GJ/year), ‘E_i’ means annual energy imported excluding E_w and B_f(GJ/year), ‘0.97’ is a factor accounting for energy losses due to bottom ash and radiation. 	
D 2	Land treatment (e.g. biodegradation of liquid or sludge discards in soils, etc.).		R 2 Solvent reclamation/regeneration.	
D 3	Deep injection (e.g. injection of pumpable discards into wells, salt domes or naturally occurring repositories, etc.).		R 3 Recycling /reclamation of organic substances which are not used as solvents (including composting and other biological transformation	



WASTE Application Form

				processes), which includes gasification and pyrolysis using the components as chemicals.	
D 4	Surface impoundment (e.g. placement of liquid or sludgy discards into pits, ponds or lagoons, etc.).		R 4	Recycling/reclamation of metals and metal compounds.	
D 5	Specially engineered landfill (e.g. placement into lined discrete cells which are capped and isolated from one another and the environment, etc.).		R 5	Recycling/reclamation of other inorganic materials, which includes soil cleaning resulting in recovery of the soil and recycling of inorganic construction materials.	
D 6	Release into a water body except seas/oceans.		R 6	Regeneration of acids or bases.	
D 7	Release to seas/oceans including sea-bed insertion.		R 7	Recovery of components used for pollution abatement.	
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.		R 8	Recovery of components from catalysts.	
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.).		R 9	Oil re-refining or other reuses of oil.	
D 10	Incineration on land.		R 10	Land treatment resulting in benefit to agriculture or ecological improvement.	Y/P
D 11	Incineration at sea (this operation is prohibited by EU legislation and international conventions).		R 11	Use of waste obtained from any of the operations numbered R 1 to R 10.	
D 12	Permanent storage (e.g. emplacement of containers in a mine, etc).		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).	
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).		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).	
D 14	Repackaging prior to submission to any of the operations numbered D 1 to D 13.				
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).				

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SECTION H MATERIALS HANDLING

H.1 Waste Types and Quantities – Existing & Proposed

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		
Class D 4			Class R 4		
Class D 5			Class R 5		
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	X	24,000
Class D 11			Class R 11		
Class D 12			Class R 12		
Class D 13			Class R 13		
Class D 14					
Class D 15					

In Table H. 1 (B) provide the annual amount of waste handled/to be handled at the facility. Additional information should be included in **Attachment H.1**. The tonnage per annum should be given of that expected for the life of the licence, with at least the next five years tonnages provided. For Landfill Review applications provide an estimate of the quantity of waste already deposited in (i) lined cells; (ii) unlined cells.