



This Report has been cleared for submission to the Board by Programme Manager Frank Clinton.  
 Signed Joe Reilly Date 4/4/13  
**OF CLIMATE, LICENSING & RESOURCE USE**

**REPORT OF THE TECHNICAL COMMITTEE ON OBJECTIONS TO LICENCE CONDITIONS**

<b>TO:</b>	Directors
<b>FROM:</b>	Technical Committee - LICENSING UNIT
<b>DATE:</b>	4 <sup>th</sup> April 2013
<b>RE:</b>	Objection to Proposed Determination for Donegal County Council, Waste Reg: W0063-02

<b>Application Details</b>	
Class(s) of activity:	D1. Deposit on, in or under land (including landfill). D15. 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).
Location of activity:	Drumaboden Landfill Site, Drumaboden, Kilmacrennan, Co Donegal.
Type of facility:	Closed Landfill
Category of Activity under IPPC Directive (2008/1/EC)	Not Annex I
Category of Activity under IED (2010/75/EU):	Not Annex I
Section 87(1)b notice sent:	30/06/2011
Review form received:	12/09/2011
PD issued:	25/07/2012
First party objection received:	21/08/2012

**Environmental Objectives Regulations Review**

**Reason for Licence Review**

On the 30<sup>th</sup> June 2011, the Agency initiated a review of the IPPC licence held by Donegal County Council for the facility located at Drumaboden Landfill Site, Drumaboden, Kilmacrennan, Co. Donegal, waste licence register number W0063-01.

The reasons for initiating this review are in light of the requirements under the following Regulations:

- (1) The European Communities Environmental Objectives (Surface Waters) Regulations 2009.

- (2) The European Communities Environmental Objectives (Groundwater) Regulations 2010.
- (3) The European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009.

## **Company**

Donegal County Council (Donegal Co. Co) has operated Drumaboden Landfill since 1980 and ceased operational activity in April 1999. The total capacity of Drumaboden Landfill is 128,000 tonnes and this amount of municipal waste has already been landfilled. On the 29th June 2001, the EPA granted Donegal Co. Co. a waste licence (W0063-01) for the closure, capping and restoration of the landfill facility, in accordance with the third schedule of the Waste Management Act, 1996.

Drumaboden Landfill is an unlined landfill. The landfill is situated on a blanket bog and is bound to the north by the River Leannan. The collection and treatment of leachate is carried out on site. Leachate from the landfill is captured in a toe drain around the perimeter of the site and pumped into a Bord na Mona Puraflo treatment system. This involves filtration of the leachate through a 2m thick peat bed, which is housed in a 25m by 16m lined lagoon providing a surface area of 400m<sup>2</sup>. Following treatment the effluent is discharged into a pipeline and effluent quality is sampled at location L-1; effluent is then discharged into the River Leannan via emission point S5.

## **Consideration of the Objection**

The Technical Committee, comprising of Ann Marie Donlon (Chair) and Marie O'Connor, has considered all of the issues raised in the Objections and this report details the Committee's comments and recommendations following the examination of the objections together with discussions with the inspectors, Orla Harrington, Brian Meaney, John Gibbons (OEE) and Stephen McCarthy (OEE) who also provided comments on the points raised.

This report considers the first party objection. No third party objections were received. The main issues raised in the objection are summarised below. However, the original objection should be referred to for greater detail and further expansion of particular points.

## **First Party Objection**

The licensee notes that the facility has been in the 'aftercare' phase since 2008. The licensee makes a general point that the PD would appear to apply new standards and guidance to a site that has been closed and where appropriate aftercare measures have been agreed with the Agency.

The licensee makes 10 points of objection.

### **A.1. Condition 2.1.1**

- 2.1.1 The licensee shall employ a suitably qualified and experienced facility manager who shall be designated as the person in charge. The facility manager or a nominated, suitably qualified and experienced deputy shall be present on the facility at all times during its operation or as otherwise required by the Agency.

*The licensee objects to this condition as there are no operations at the site and it is not considered applicable to a landfill in the aftercare phase. The site has been fenced off and kept locked when unsupervised. Site visits by supervisory staff will be as required to ensure adequate maintenance and monitoring at the site.*

Technical Committee's Evaluation:

The TC note that this facility is not operational and therefore recommends the condition is amended to make it clear that a facility manager should be available to the Agency and any member of the public to deal with any issues arising.

**Recommendation:**

Amend condition 2.1.1 to read as follows:

2.1.1 The licensee shall employ a suitably qualified and experienced facility manager who shall be designated as the person in charge. The facility manager or a nominated, suitably qualified and experienced deputy **shall be available to the Agency and any member of the public** or as otherwise required by the Agency.

**A.2. Condition 2.2.1, 2.2.2, 2.2.2.2, 2.2.2.3, 2.2.2.4, 2.2.2.8, 2.2.2.9**

*The licensee objects to aspects of Condition 2 as listed above and requests that the EMS condition as per the current licence would be retained. The licensee queries why the scope has increased and considers the current EMS adequate. The licensee points out that they are not aware of the OEE having any concerns in relation to the existing EMS.*

Technical Committee's Evaluation:

The TC notes that there current licence specifies requirements for the management of the activity and that this landfill facility is in 'aftercare' phase and as a result limited monitoring and control is being undertaken. The TC considers that the licence should reflect the risk posed by the facility and the recommends that the Schedule of Environmental Objectives and Targets, Landfill Environmental Management Programme (LEMP) and the Efficient Process Control requirements should be removed to ensure that emphasis is on the right aspects of the activity, namely maintenance, monitoring and leachate treatment control. For this same reason, the TC recommends retaining the documentation requirements and the maintenance programme.

**Recommendation:**

Delete Condition 2.2.2.2, 2.2.2.3 and 2.2.2.9. Delete 'establish and' from 2.2.1. Consequently Condition 2.2 should read as follows:

2.2 Environmental Management System (EMS)

2.2.1 The licensee shall **maintain** an Environmental Management System (EMS). The EMS shall be updated on an annual basis.

2.2.2 The EMS shall include, as a minimum, the following elements:

2.2.2.1 Management and Reporting Structure.

2.2.2.2 Documentation

(i) The licensee shall establish and maintain, not later than six months

from date of grant of licence, an environmental management documentation system which shall be to the satisfaction of the Agency.

- (ii) The licensee shall issue a copy of this licence to all relevant personnel whose duties relate to any condition of this licence.

2.2.2.3 Corrective Action

The licensee shall maintain procedures to ensure that corrective action is taken should the specified requirements of this licence not be fulfilled. The responsibility and authority for persons initiating further investigation and corrective action in the event of a reported non-conformity with this licence shall be defined.

2.2.2.4 Awareness and Training

The licensee shall maintain procedures for identifying training needs, and for providing appropriate training, for all personnel whose work can have a significant effect upon the environment. Appropriate records of training shall be maintained.

2.2.2.5 Communications Programme

The licensee shall establish and maintain a Public Awareness and Communications Programme to ensure that members of the public can obtain information at all reasonable times, concerning the environmental performance of the facility.

2.2.2.6 Maintenance Programme

The licensee shall establish and maintain a programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment. Appropriate record keeping and diagnostic testing shall support this maintenance programme. The licensee shall clearly allocate responsibility for the planning, management and execution of all aspects of this programme to appropriate personnel (see Condition 2.1 above).

### A.3. Condition 3.3

3.3 The licensee shall install on all emission points such sampling points or equipment, including any data-logging or other electronic communication equipment, as may be required by the Agency. All such equipment shall be consistent with the safe operation of all sampling and monitoring systems.

*The licensee objects to this condition as it is considered disproportionate to the need for data-logging or other electronic communication equipment at this site which is in the aftercare phase. The licensee points out that monitoring of emissions are undertaken as agreed with OEE.*

Technical Committee's Evaluation:

The TC considers that this condition does not specifically require the installation of data-logging or other electronic communication equipment at the facility but it does enable the Agency to require it should such circumstances occur that it is deemed necessary. The TC recommends retaining the condition as it is an enabling requirement.

**Recommendation:** No change.

#### **A.4. Condition 3.6**

3.6 The licensee shall have in storage an adequate supply of containment booms and/or suitable absorbent material to contain and absorb any spillage at the facility. Once used, the absorbent material shall be disposed of at an appropriate facility.

*The licensee points out that they maintain a supply of spillage kits and absorbents centrally and they also utilise private sector spill response companies.*

##### Technical Committee's Evaluation:

The TC notes that the facility is in 'aftercare' phase and is unsupervised. The TC considers that a spill is unlikely and therefore this requirement is unnecessary.

##### **Recommendation:**

Delete condition 3.6 and renumber Condition 3 accordingly.

#### **A.5. Condition 3.15.1**

3.15 Leachate Management

3.15.1 The licensee shall maintain a leachate management programme. This shall consist *inter alia* of the following:

- (i) Installation of three leachate abstraction wells. Leachate shall be pumped from these wells to the leachate treatment system.
- (ii) Provision of an appropriately sized leachate treatment system.
- (iii) A lined lagoon for the storage of raw leachate prior to treatment.
- (iv) Installation of mains power to operate leachate extraction pumps.
- (v) Separation of clean and contaminated surface water, and discharge of contaminated surface water to the leachate treatment system.
- (vi) All structures for the storage and/or treatment of leachate shall be fully enclosed except for inlet and outlet piping.

*The licensee objects to this condition as it is considered unnecessary and would require significant additional expenditure. The licensee advises that additional leachate abstraction wells are not envisaged and only a major overhaul of the puraflo treatment system is being undertaken. They also advise that the leachate management was agreed with the EPA under the Restoration and Aftercare Plan (63-1/Gen007jg)*

##### Technical Committee's Evaluation:

The TC notes that in correspondence 63-1/Gen007jg dated 19/10/2005, that the Agency agreed only the 'capping system' subject to conditions. This condition was carried over from the current licence. Although the TC considers that infrastructure may already be in place, it is not in a position to decide whether it satisfies the existing requirements. The TC recommends retaining the requirement as OEE are best placed to agree the leachate infrastructure as provided by Condition 3.15.2.

**Recommendation:** No change

#### **A.6. Condition 3.17**

3.17 Surface Water Management

- 3.17.1 Effective surface water management infrastructure shall be provided and maintained at the facility. As a minimum, the infrastructure shall be capable of the following:-
  - a) The prevention of contaminated water and leachate discharges into surface water drains and courses; and
  - b) The collection /diversion of run-off arising from capped and restored areas.
- 3.17.2 Surface water runoff perimeter drains shall be installed and maintained at the facility unless otherwise agreed by the Agency.
- 3.17.3 The licensee shall establish and maintain a drawing indicating all drainage arrangements at the facility.

*The licensee objects to this condition as there are no further surface water management infrastructure considered necessary at the site. The surface water management at the site is as agreed with the Agency in 2005 Ref 63-1/Gen007jg.*

Technical Committee's Evaluation:

The TC notes that in correspondence 63-1/Gen007jg dated 19/10/2005, that the Agency agreed only the 'capping system' subject to conditions. This condition is not in the current licence and was included to allay concerns the licensing inspector had in relation to the surface water infrastructure. The OEE advised that it was satisfied with the surface water infrastructure in place at the facility and that the focus is on the leachate collection and treatment. The TC notes that condition 3.15 requires the separation of clean and contaminated surface water.

The TC notes that the surface water management infrastructure is already in place but it needs to be maintained. The TC recommends rewording the condition to reflect the current circumstances.

**Recommendation:**

Reword Condition 3.17 as follows:

- 3.17 Surface Water Management
  - 3.17.1 Effective surface water management infrastructure shall be maintained at the facility.
  - 3.17.2 The licensee shall establish and maintain a drawing indicating all drainage arrangements at the facility.

**A.7. Condition 7.1 and 7.2**

- 7.1 The licensee shall carry out an audit of the energy efficiency of the site within one year of the date of grant of this licence. The audit shall be carried out in accordance with the guidance published by the Agency, "Guidance Note on Energy Efficiency Auditing". The energy efficiency audit shall be repeated at intervals as required by the Agency.
- 7.2 The audit shall identify all practicable opportunities for energy use reduction and efficiency and the recommendations of the audit will be incorporated into the Schedule of Environmental Objectives and Targets under Condition 2 above.

*The licensee objects to these conditions as it is considered disproportional given that the energy usage at the site is approximately 2,500kW per year for two leachate pumps.*

Technical Committee's Evaluation:

The TC notes that power usage at the site is minimal. However it is a requirement of the Section 40(4)(f) of the Waste Management Act 1996 to 2012 that the Agency shall not grant a waste licence unless it is satisfied that '*energy will be used efficiently in the carrying on of the activity concerned*'. The TC recommends that condition 7.1 and 7.2 be replaced with a general requirement to use energy efficiently.

**Recommendation:**

Replace Condition 7.1 with the following and delete condition 7.2.

**7.1** The licensee shall ensure that energy is used efficiently in the carrying on of the activity.

**A.8. Condition 10.2 and 10.3**

10.2 Closure, Restoration and Aftercare Management Plan (CRAMP)

10.2.1 The closure, restoration and aftercare plan for the facility shall be reviewed annually and proposed amendments thereto notified to the Agency for agreement as part of the AER. No amendments may be implemented without the agreement of the Agency.

10.2.2 The licensee shall have regard to the Environmental Protection Agency Guidance on Environmental Liability Risk Assessment, Decommissioning Management Plans and Financial Provision when implementing Condition 10.2.1 above.

10.3 The CRAMP shall include, as a minimum, the following:

- (i) A scope statement for the plan;
- (ii) The criteria that define the successful decommissioning of the activity or part thereof, which ensures minimum impact on the environment;
- (iii) A programme to achieve the stated criteria;
- (iv) where relevant, a test programme to demonstrate the successful implementation of the decommissioning plan;
- (v) Details of long term supervision, monitoring, control, maintenance and reporting requirements for the restored facility; and
- (vi) Details of the costing are for the plan and the financial provisions to underwrite those costs.

*The licensee objects to these conditions as it is considered unnecessary to consider the need for a new plan to take account of the most recent guidance given that works at the site have been undertaken in accordance with the agreed plan (Ref 63-1/Gen007jg).*

Technical Committee's Evaluation:

The TC note that the activity is in the 'aftercare' phase and therefore the Closure, Restoration and Aftercare Management Plan (CRAMP) is being actively implemented at the facility. However, the TC notes that in correspondence 63-1/Gen007jg dated 19/10/2005, that the Agency agreed only the 'capping system' subject to conditions.

The TC considers that the CRAMP document needs to be up to date and needs to deal with any on-going issues at the facility. It is impossible to foresee new requirements and changes to the facility in the future that may need to be addressed by an amendment to the CRAMP. The TC recommends retaining the conditions.

**Recommendation:** No change.

## **A.9. Condition 12.2.2**

12.1.1 The licensee shall arrange for the completion, by an independent and appropriate qualified consultant, of a comprehensive and fully costed Environmental Liabilities Risk Assessment (ELRA) which addresses the liabilities from past and present activities. The assessment shall include those liabilities and costs identified in Condition 10 for execution of the CRAMP. A report on this assessment shall be submitted to the Agency for agreement within twelve months of date of grant of this licence. The ELRA shall be reviewed as necessary to reflect any significant change on site, and in any case every three years following initial agreement. Review results are to be notified as part of the AER.

*The licensee objects to this condition as the site has been capped and restored. If it is considered necessary then the licensee requests that this be permitted to be undertaken in-house similar to the recently completed ELRA for the Waste Water Treatment Works in the county. The licensee advises that it does not specifically underwrite environmental risks but as a Local Authority is committed to provide for the proper environmental management of the site.*

### Technical Committee's Evaluation:

The TC considers that an ELRA is necessary for all landfills and this type of requirement is regarded as good practice. However, it is noted by the TC and OEE that this landfill has been closed a long time, it is operated by a Local Authority and it is not subject to the Landfill Directive. In these specific circumstances of a closed landfill operated by a local authority, it is considered that the ELRA could be completed by a competent person within the Local Authority and the costs associated with unknown and known liabilities (closure) are being met currently. The TC recommends flexibility in the condition to allow the OEE which is in the best position to agree such matters as who should undertake an ELRA and what financial provision, if any, is necessary in these circumstances.

### **Recommendation:**

Reword Condition 12.2.2 and 12.2.3 to read as follows:

- 12.1.1 The licensee shall arrange for the completion, by an independent and appropriate qualified consultant **or competent person as agreed by the Agency**, of a comprehensive and fully costed Environmental Liabilities Risk Assessment (ELRA) which addresses the liabilities from past and present activities. The assessment shall include those liabilities and costs identified in Condition 10 for execution of the CRAMP. A report on this assessment shall be submitted to the Agency for agreement within twelve months of date of grant of this licence. The ELRA shall be reviewed as necessary to reflect any significant change on site, and in any case every three years following initial agreement. Review results are to be notified as part of the AER.
- 12.1.2 As part of the measures identified in Condition 12.2.1, the licensee shall, to the satisfaction of the Agency, make financial provision to cover any liabilities associated with the operation (including closure, restoration and aftercare). The amount of indemnity held shall be reviewed and revised as necessary, but at least annually **unless otherwise agreed by the Agency**. Proof of renewal or revision of such financial indemnity shall be included in the annual 'Statement of Measures' report identified in Condition 12.2.1 **unless otherwise agreed by the Agency**.



**A.10. Schedule C Control and Monitoring**

*The licensee objects to the frequency of noise and dust monitoring as the site is in aftercare phase and there is no need for monitoring of dust and noise annually at the facility as previously agreed with OEE.*

*The licensee objects to the frequency of groundwater, surface water, leachate and landfill gas as these have been reduced to biannually as agreed with OEE. The requirement to cease the monitoring of List I and II substances was also agreed.*

Technical Committee's Evaluation:

The TC considers dust deposition and noise are not significant aspects of the 'aftercare' phase of the landfill and therefore recommends that the schedules be reworded to allow that any future monitoring will be as may be required by the Agency. The TC is satisfied that biannual monitoring of landfill gas is sufficient for a landfill in 'aftercare' phase.

The TC notes that the discharge of treated leachate is into a pearl mussel catchment and that it was reported to the Board at PD stage that there was insufficient monitoring data and this is why the monitoring frequency was reinstated. The TC notes that OEE agreed a reduction in the frequency of groundwater and surface water monitoring and that they are best placed to establish the site specific appropriate frequency. Given that treated leachate continues to be discharged from the facility and the licensee previously advised under objection A.3 that the puraflo treatment plant was being overhauled, the TC considers quarterly monitoring for some parameters in leachate is required for the time being. The licensee can request a reduction in monitoring frequency under the terms of the licence in due course. The TC recommends amending the monitoring frequency in the above mentioned schedules.

The monitoring of List I and II parameters applies to groundwater only. The TC recommends that this requirement should be updated in line with the EC EO (Groundwater) Regulations 2010, as amended and therefore specifies monitoring for hazardous substances (as defined in the 'Classification of Hazardous and Non-hazardous Substances in Groundwater' issued by the Agency). Monitoring for the relevant hazardous substances should be carried out at least annually, unless a case for less frequent monitoring is agreed by the Agency.

**Recommendation:**

Amend the monitoring frequency on Schedule C.1.1., C.3, C.4.2, C.4.3 ,as follows:

*C.1.1. Monitoring of Emissions to Air*

**Monitoring of Landfill Gas**

**Locations:** LG1, LG2, LG3, LG4, LG5 (or any other locations that may be requested by the Agency)

Control Parameter	Monitoring	Key Equipment <sup>Note 1</sup>
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Methane (CH <sub>4</sub> ) % v/v	Biannually	Infrared analyser/flame ionisation detector
Carbon dioxide (CO <sub>2</sub> )%v/v	Biannually	Infrared analyser/ flame ionisation detector
Oxygen(O <sub>2</sub> ) %v/v	Biannually	Electrochemical cell
Atmospheric Pressure	Biannually	Standard
Temperature	Biannually	Standard

Note 1: The licensee shall maintain appropriate access to standby and/or spares to ensure the operation of the abatement system.

### C.3 Noise Monitoring

#### Noise Monitoring Frequency and Technique

Parameter	Monitoring Frequency	Analysis Method/Technique
L(A) <sub>EQ</sub> [30 minutes]	As may be required by the Agency	Standard <sup>Note 1</sup>
L(A) <sub>10</sub> [30 minutes]	As may be required by the Agency	Standard <sup>Note 1</sup>
L(A) <sub>90</sub> [30 minutes]	As may be required by the Agency	Standard <sup>Note 1</sup>
Frequency Analysis(1/3 Octave band analysis)	As may be required by the Agency	Standard <sup>Note 1</sup>

Note 1: "International Standards Organisation. ISO 1996. Acoustics - description and Measurement of Environmental noise. Parts 1, 2 and 3."

### C.4 Ambient Monitoring

#### C.4.2 Surface Water, Groundwater and Treated Leachate Monitoring parameters

Surface water, groundwater & treated leachate monitoring shall be as below:

Parameter <sup>Note 1</sup>	SURFACE WATER Monitoring Frequency	GROUNDWATER Monitoring Frequency	TREATED LEACHATE Monitoring Frequency
Flow	-	-	Quarterly
Visual Inspection/Odour <sup>Note 2</sup>	Biannually	Biannually	Quarterly
Groundwater Level	Not Applicable	Biannually	Not Applicable
Leachate Level	Not Applicable	Not Applicable	Weekly
Ammoniacal Nitrogen	Biannually	Biannually	Quarterly
BOD	Biannually	Not Applicable	Quarterly
COD	Biannually	Not Applicable	Quarterly
Chloride	Biannually	Biannually	Quarterly
Dissolved Oxygen	Biannually	Biannually	Not Applicable
Electrical Conductivity	Biannually	Biannually	Quarterly
pH	Biannually	Biannually	Quarterly
Total Suspended Solids	Biannually	Not Applicable	Not Applicable
Temperature	Biannually	Biannually	Quarterly

Toxicity	-	-	Note 6
Boron	Not Applicable	Annually	Annually
Cadmium	Note 4	Note 4	Note 4
Calcium	Annually	Annually	Annually
Chromium (Total)	Note 4	Note 4	Note 4
Copper	Note 4	Note 4	Note 4
Cyanide (Total)	Not Applicable	Note 4	Note 4
Fluoride	Not Applicable	Annually	Annually
Iron	Annually	Biannually	Annually
Lead	Note 4	Note 4	Note 4
Hazardous Compounds	-	Note 5	-
Magnesium	Annually	Annually	Annually
Manganese	Annually	Annually	Annually
Mercury	Note 4	Note 4	Note 4
Potassium	Annually	Biannually	Annually
Sulphate	Annually	Annually	Annually
Sodium	Annually	Biannually	Annually
Total Alkalinity	Annually	Annually	Annually
Total Phosphorus / orthophosphate	Annually	Annually	Annually
Total Oxidised Nitrogen	Annually	Biannually	Quarterly
Total Organic Carbon	Not Applicable	Biannually	Not Applicable
Residue on evaporation	Not Applicable	Annually	Not Applicable
Zinc	Note 4	Note 4	Note 4
Phenols	Not Applicable	Biannually	Not Applicable
Faecal Coliforms <sup>Note 6</sup>	Not Applicable	Biannually	Annually
Total Coliforms <sup>Note 6</sup>	Not Applicable	Biannually	Annually

Note 1: All the analysis shall be carried out by a competent laboratory using standard and internationally accepted procedures. The testing laboratory and the testing procedures shall be agreed by the Agency in advance.

Note 2: Where there is evident gross contamination of leachate, additional samples should be analysed.

Note 3: Toxicity testing at L-1 as required by the Agency.

Note 4: Once off for specific pollutants, priority substances and priority hazardous substances as per the *Surface Waters Regulations 2009* for L-1 and SW4 and as per the *Groundwater Regulations 2010* for GW6 and GW7 within three months from date of grant of licence and thereafter as required by the Agency.

Note 5: The relevant hazardous substances for monitoring in groundwater shall be identified by the licensee by undertaking a risk based assessment. The Licensee shall have regard to the 'Classification of Hazardous and Non-hazardous Substances in Groundwater' issued by the Agency. Monitoring for the identified hazardous substances shall be carried out at least annually, unless a case for less frequent monitoring is agreed by the Agency.

Note 6: In the case where groundwater is extracted for drinking water, if there is evidence of bacterial contamination, the analysis at up gradient and downgradient monitoring points should include enumeration of total bacteria at 22°C.



### C.4.3: Dust Monitoring Frequency and Technique

Location: DG1, DG2, DG3 or alternative locations as may be agreed by the Agency.

Parameter	Monitoring Frequency	Analysis Method/Technique
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Dust deposition (mg/m <sup>2</sup> /day)	As may be required by the Agency	Standard Method
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### **Overall Recommendation**

It is recommended that the Board of the Agency grant a licence to the licensee

- (i) for the reasons outlined in the proposed determination and
  - (ii) subject to the conditions and reasons for same in the Proposed Determination,
- and
- (iii) subject to the amendments proposed in this report.

Signed

A handwritten signature in cursive script, reading "Ann Marie Donlon".

Ann Marie Donlon  
for and on behalf of the Technical Committee