

Job Ref: 11-06

17th August 2012

Environmental Licensing Programme,
Environmental Protection Agency,
P.O Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Oxygen Environmental
Merrywell Industrial Estate
Ballymount Road Lower
Dublin 22
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ENVIRONMENTAL PROTECTION
AGENCY
21 AUG 2012

Oxygen Reference : 12.EPA208-1 170812BM

Your Ref: W0208-01/ak01NH

Re: " Technical Amendment B " to Schedule A of License W0208-01.

Location: Merrywell Industrial Estate, Ballymount Road Lower, Clondalkin, Dublin 22.

Dear Sirs,

I refer to the Agencies letter dated 2nd August 2012 which we received from the Office of Environmental Enforcement addresses to Mr. John Clune (Facility Manager) informing Oxygen Environmental (OE) that our request for Technical amendment B submission received by the Agency on 22nd May 2012 could not be accommodated under that submission and advising that we submit this request to the Agencies Licensing Programme to determine if the proposal can be accommodated by means of a Technical Amendment.

This submission represents a request by Oxygen Environmental to the Agency to make a Technical Amendment on our existing waste licence ref: W0208-01 for the waste Recycling facility located at Merrywell Industrial Estate, Ballymount Road Lower, Clondalkin, Dublin 22..

In support of this application, I enclose herewith the following documentation:

- (i) EPA letter dated 02/08/12 for reference.
- (ii) Copy of the original Technical Amendment B submission by Oxygen Environmental dated 18th May 2012.

We trust the Agency will look favourably upon this request for an amendment of waste licence W0208-01. Should you have any further queries, please do not hesitate to contact the undersigned.

Yours sincerely,

Brian Moylan

Planning & Compliance
Oxygen Environmental
Merrywell Industrial Estate, Ballymount Road Lower, Dublin 22
T(direct) - 01 4263125
Mobile - 086 0246075
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ENVIRONMENTAL PROTECTION AGENCY
22 AUG 2012
RICHVIEW
ENVIRONMENTAL LICENSING UNIT



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Office of
Environmental
Enforcement

Regional Inspectorate, McCurniskey House,
Richview, Clonskeagh Road,
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ENVIRONMENTAL PROTECTION
AGENCY

21 AUG 2012

Mr. John Clune
Operations Manager
Oxigen Environmental Limited
Merrywell Industrial Estate
Ballymount Road Lower
Dublin 22

REF: W0208-01

02/08/2012

Our Ref: W0208-01/ak01NH

Dear Mr. Clune

I refer to correspondence dated 18/05/2012 and received by the Agency on 22/05/2012 regarding a proposed technical amendment to Waste Licence Reg. No. W0208-01.

I am to inform you that your request to accept waste assigned the EWC Code 19 12 10 combustible waste (Refuse Derived Fuel), compatible with the waste types listed in Table A.1 of Waste Licence Reg. No. W0208-01, can be considered under the current waste licence and as such is agreed by the Agency subject to the following;

- A maximum of 2,500 tonnes per annum of SRF may be accepted at the facility with a weekly maximum of 100 tonnes.
- Compliance with the requirements of the waste licence.
- This agreement may be revoked at any time by the Agency.

Your proposal to accept waste described in your proposal as Commercial & Industrial (C&I) waste and the inclusion of a condition relating to research and development pilot projects cannot be accommodated under the existing waste licence. A Technical Amendment (Section 42(B) (1) of the Waste Management Acts (WMA)) or a Review of your licence (Section 46(8) of the WMA) will be required to provide for the proposed changes.

To determine if the proposed change can be accommodated by Technical Amendment you should submit the following information to the Agency's Environmental Licensing Programme (ELP), EPA, P.O. Box 3000, Johnstown Castle Estate, Co. Wexford:

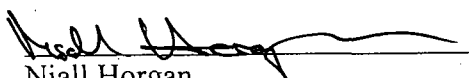
- Details of the requested change(s).
- Reasons for the change(s) requested.
- Details of any increase or changes in emissions resulting from the change(s).
- An assessment of the likely impacts of any increase/changes in emissions.
- Please also enclose a copy of this letter for their reference.



If the alteration is considered to be a significant change and cannot be accommodated by a Technical Amendment, the ELP will notify you of the process for applying for a Review.

Please quote the above reference in any future correspondence to the OEE in relation to this matter. If you have any further queries please contact Niall Horgan at 01-2680100.

Yours sincerely



Niall Horgan

Inspector

Office of Environmental Enforcement

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Our Ref: bm
Job Ref: 11-06

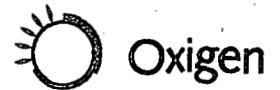
18th May 2012

Mr. Donal Howley,
Environmental Protection Agency,
McCumiskey House,
Richview,
Clonskeagh Road,
Dublin 14.

COPY

ENVIRONMENTAL PROTECTION
AGENCY

21 AUG 2012



Oxygen Environmental
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Web: www.oxygen.ie

Oxygen Reference : 12.EPA208-1 160512BM

Re: " Technical Amendment B " to Schedule A of License W0208-01.

Location: Merrywell Industrial Estate, Ballymount Road Lower, Clondalkin, Dublin 22.

Dear Mr. Howley,

I refer to a previous submission request by Oxygen Environmental on 19th April 2011 (ref : 11.EPA208-1 190411MB), wishing to make a Technical Amendment to Schedule A of the above referenced Licence (the said letter is attached).

Subsequent to this Technical Amendment request submission, Oxygen Environmental received a letter addressed to Mr. John Clune Operation Manager, dated 22nd July 2011 requesting additional information clarifying a number of matters prior to the Agency making its final decision. (ref : W0208-01/gc116JH.docx) (the said letter is also attached).

I wish to clarify that this submission for a "Technical Amendment B" request does not have any effect on the current license review application which we submitted on 7th May 2010 (ref : 801-02) and both should be dealt with separately.

The following additional information was requested by the Agency in response to the Technical Amendment Request:

- 1) *Details to demonstrate how any waste type not currently identified in Table A.1 " Waste Categories and Quantities " is compatible with a waste stream identified in that table.*
- 2) *Details with regard to the nature and source of such "compatible waste streams".*
- 3) *Details with regard to waste acceptance procedures for such "compatible waste streams".*
- 4) *Details of handling and processing proposed for these "compatible waste streams". Identify if it is to be processed along with other waste streams currently provided for under Table A.1 " Waste Categories and Quantities ".*
- 5) *Details of any waste processing equipment and control measures that may be required for acceptance and handling of any proposed waste stream, having regard to the quantities of the waste proposed to be accepted.*



It is important to note that Oxigen Environmental are not looking for any change in the total volume on the Licence but are seeking to include 2 no. additional categories / composition of waste types (to include associated process involved with each compatible waste stream as identified in Figures 1 & 2 below) and revised part of the volumes allocated to each category as shown in the table 1 below.

We are also requesting that the license may be so amended that any future request for a change to the composition volumes will not require a technical amendment.

I wish to make reference to Note 1 & 2 of Table A.1 , Schedule A of the existing Licence 208-01, which may facilitate us in making this amendment to our Licence.

The following submission by Oxigen Environmental in response to the additional information requested by the Agency, will demonstrate the necessity for this Technical Amendment to be approved to ensure full compliance in accordance with the Licence at the Ballymount Facility as previously discussed during site inspections carried out at this facility by the Agency.

The following **Table 1** sets out the waste categories and quantities of the current Licence ref. W0208-1 Technical Amendment A, compared to what is now being applied for as part of a request for Technical Amendment B.

Table 1:

Existing Licence W0208-1 Schedule A2		Proposed Technical Amendment 'B' submitted to the EPA by OE dated 19 th April 2011.		Proposed Technical Amendment 'B' being currently submitted to the EPA by OE dated 16 th May 2012.	
Technical Amendment A Dated 21 st May 2008		Schedule A W0208-1(B)		Schedule A W0208-1(B)	
Household (Dry Recyclables)	80,000	Household (Dry Recyclables)	80,000	Household (Dry Recyclables)	80,000
Commercial (Dry Recyclables)	40,000	Commercial (Dry Recyclables)	10,000	[Commercial (Dry Recyclables)]	[20,000]
Industrial (Dry Recyclables)	19,000	Commercial and Industrial	65,000	Commercial and Industrial	80,000
Industrial Sludges	1,000	Industrial Sludges	5,000	Industrial Sludges	7,500
		Solid Recoverable Fuels	2,500	Solid Recoverable Fuels	2,500
Construction and Demolition	80,000	Construction and Demolition	57,500	Construction and Demolition	50,000
Hazardous [incl. Healthcare]	30,000 [10,000]	Hazardous [incl. Healthcare]	30,000 [10,000]	Hazardous [incl. Healthcare]	30,000 [10,000]
Total	250,000	Total	250,000	Total	250,000

The following is Oxigen Environmental's response to each item no.'s 1 – 5 of the additional information requested by the Agency:

1. *Details to demonstrate how any waste type not currently identified in Table A.1 " Waste Categories and Quantities " is compatible with a waste stream identified in that table.*

OE Response :

Of the requested changes to the composition of waste types in Schedule A of the current Licence Ref : 0208-01, two additional categories are requested to be included. These are:

- a. Commercial & Industrial (C&I)
- b. Solid Recovered Fuel (SRF).

The current Waste license W0208-01 identifies the following Waste Categories for acceptance in accordance with table A.1 :

WASTE TYPE <small>Note 1</small>	MAXIMUM <small>Note 2</small> (TONNES PER ANNUM)
Household (Dry Recyclables)	80,000
Commercial (Dry Recyclables)	40,000
Industrial (Dry Recyclables)	19,000
Industrial Sludges	1,000
Construction & Demolition	80,000
Hazardous (Including Healthcare Waste)	30,000 [10,000]
Total	250,000

Note 1: Any Proposal to accept other compatible waste streams must be agreed in advance by the Agency and the total amount of waste must be within that specified.

Note 2: The Individual Limitations on waste streams may be varied with the agreement of the Agency subject to the overall total limit and the limits for Hazardous (including Healthcare) waste staying the same. Other compatible waste streams can be accepted subject to advance written agreement of the Agency and subject to the overall tonnage limit.

The current licence approves the acceptance of Household (Dry Recyclables), Commercial (Dry Recyclables), Industrial (Dry Recyclables) and Construction & Demolition Waste as seen above. The current trends towards what the general public are putting into skips at civic amenity sites and what private individuals are disposing of when ordering skips for their homes, have changed to what once was best described as C&D waste. It is the contents of these skips that can be best described now as C&I. This waste may be a mix of household, Commercial & Industrial in the form of dry mixed and Bulky waste.

It is for this reason that Oxigen Environmental wish to include C&I as an acceptable "Waste Category" to be identified in table A.1. of schedule A of the Licence.

Oxigen Environmental also wish to include SRF (Solid recovered Fuel) as a "Waste Category" to be identified in table A.1. of schedule A of the Licence.

Please note that the individual waste codes to be associated under both C&I and SRF category headings are already listed as EWC codes that are acceptable at this facility, as per the original application submitted to the Agency on 4th August 2004. Please refer to waste licence application section "D3 – Materials Management" which is included for reference under this submission. (Appendix A)

Oxigen Environmental respectfully contends that the nature and types of waste material to be accepted on the description categories "C&I" and "SRF" are compatible with both the approved list of EWC codws and the categories in Table A.1 of schedule A of the current Licence 208-01.

2. Details with regard to the nature and source of such "compatible waste streams".

OE Response :

The nature & source of each of these "compatible waste streams" are as follows:
"C+I" and "SRF" are identified separately below , for clarity :

a. **Commercial & Industrial (C&I) :**

Nature :

Relevant European Waste Catalogue (EWC) Codes describing the nature of the C+I waste streams can be described as follows:

15 WASTE PACKAGING: ABSORBENT, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED

15 01 packaging (including separately collected Municipal Packaging Waste)

15 01 01 Paper & Cardboard
15 01 02 Plastic Packaging
15 01 04 Metallic Packaging
15 01 06 Mixed Packaging
15 01 09 Textile Packaging

15 02 absorbents, filter materials, wiping cloths and protective clothing

15 02 03 absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02

20 MUNICIPAL WASTE (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS

20 01 separately Collected Fractions (except 15 01)

20 01 01 Paper & Cardboard
20 01 02 Glass
20 01 10 Cloths
20 01 11 Textiles
20 01 39 Plastics
20 01 99 other fractions not otherwise specified

20 02 garden & Park Wastes

20 02 01 Green Waste / Biodegradable Waste
20 02 02 Soil and Stones
20 02 03 Other non-biodegradable Wastes

20 03 other Municipal Wastes

20 03 07 Bulky Waste
20 03 99 Municipal Waste not otherwise specific

Source :

The source of the C&I waste streams are as follows :

The waste streams in question are delivered to the Ballymount Recycling Facility from a various number of locations. These can be summaries as follows:

- i. Oxigen Environmental operated Public Civic Amenity Sites (PCAS).
 - ii. Oxigen Environmental Waste Transfer Stations.
 - iii. Local Authority Waste Management services.
-
- i. Oxigen Environmental currently operate and/or provide skip services at the following Public Civic Amenity Site located at 16 no. different facilities as follows :

List of current Public Civic Amenity Sites delivering to Ballymount Recycling Facility :

Co. Dublin:

- Ballymount PCAS
- Ballyogan PCAS
- Estuary Swords – Fingal PCAS
- Coolmine – Blanchardstown PCAS
- Shamrock Terrace – North Strand Road PCAS
- Ringsend PCAS

Co. Kildare:

- Silliot Hill, Kilcullen PCAS
- Athy PCAS

Co. Meath:

- Navan PCAS
- Trim PCAS
- Kells PCAS

Co. Westmeath:

- Mullingar PCAS
- Athlone PCAS

Co. Offaly:

- Edenderry PCAS
- Birr PCAS
- Derryclure PCAS

The skips contained and each of these sites are either directly transported to the Ballymount Recycling Facility (depending on proximity) or directed thro' to a relevant waste transfer station (as listed below) and bulk loaded before being forwarded on to the Ballymount Recycling Facility. The skips that are made available to the public at these PCAS are described as Bulky Waste and C+D waste types. The general public can discard appropriate type waste types into the skips being provided. It is the contents of these skips that can be best described as C&I.

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- ii. Oxigen Environmental & their subsidiary companies currently operate the following Waste Transfer Stations at 6 no. locations as follows :

List of Waste Transfer Stations :

Co. Louth:

- Dundalk, Coes Road waste transfer station.

Co. Kildare:

- Kilcullen, Silliot Hill waste transfer station.

Co. Offaly:

- Tullamore, Derryclure waste transfer station.
- Daingean, Barnan waste transfer station.

Co. Westmeath:

- Athlone, Ballydonagh waste transfer station.

Co. Cavan:

- Cavan, Killygarry waste transfer station.

Skips that have being provided to individual households and / or skips that are being provided at the various Public Civic Amenity Sites are delivered to the relevant waste transfer stations and bulk loaded before being transported on to the Ballymount Recycling Facility by HGV's. The contents of all these HGV deliveries can be best described as C&I / Bulky Waste and C+D waste types. The current trend towards what the general public are putting into skips at civic amenity sites and what private individuals are disposing of when ordering skips for their homes, have changed to what once was best described as C&D waste. This waste may be a mix of household, Commercial & Industrial in the form of dry mixed and Bulky waste.

- iii. Local Authority Waste Management services.

Oxigen Environmental currently facilitates South Dublin County Council on the acceptance of various mixed dry waste streams from the following Waste Management services under the local authority control.

- South Dublin "Operations" waste collection services.
- South Dublin "cleansing" waste collection services.
- South Dublin "Burial Grounds" waste collection services.

The waste streams would comprise of South Dublin region litter bins, Various Parks & cemetery litter bins and Green Waste / Biodegradable Waste and the contents of waste from South Dublin County Council Housing department refurbishment works when upgrading their housing stock.

Oxigen Environmental also wish to be approved to accept C&I waste streams appropriately Licenced alternative sources other than the above lists at i, ii & iii above, without the necessity for prior approval from the Agency.

b. Solid Recovered Fuel (SRF):

Nature :

Relevant European Waste Catalogue (EWC) Code describing the nature of the SRF can be described as follows:

19 WASTE FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE

19 12 Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified

19 12 10 Combustible Waste (refuse derived fuel)

19 12 12 Other Waste (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11.

Source :

Oxigen Environmental wish to include " SRF" as a waste category in table A.1 for the acceptance at this facility. The source of the SRF waste streams are as follows

During the period from Jan - Dec 2011, Oxigen Environmental accepted SRF from Thornton's Recycling, at Unit S3B Henry Road, Park West Business Park, Dublin 12.

The was accepted was in bulk loads, which Oxigen Environmental baled & wrapped for further transport to approved destinations which were used in the cement kiln industry as a fuel.

Oxigen Environmental wishes to have this location of waste origin approved for acceptance of SRF. We are also requesting that any future acceptance of SRF may be taken from other appropriately licensed sources without the necessity for prior approval from the Agency within the limit as specified in Table 1 above at 2,500 tpa.

3. *Details with regard to waste acceptance procedures for such " compatible waste streams".*

OE Response :

All the "compatible waste streams" accepted at the facility is accepted in accordance with conditions outlined in Waste Licence W0208-01 and in accordance with the EMS Waste Acceptance Procedure (OXEP 01). All waste is subject to a waste inspection once tipped in reception hall areas as outlined in the Receipt, Processing and Dispatch of Waste Procedure (OXEP 02).

Both documents OXEP 01 and OXEP 02 are included for reference under this submission. Please refer to Appendix A – attachments.

4. Details of handling and processing proposed for these "compatible waste streams". Identify if it is to be processed along with other waste streams currently provided for under Table A.1 " Waste Categories and Quantities ".

OE Response :

All the "compatible waste streams" are handled and processed in accordance with conditions outlined in Waste Licence W0208-01 and in accordance with the EMS Waste Acceptance Procedure (OXEP 01) And the Receipt, Processing and Dispatch of Waste Procedure (OXEP 02). Please refer to Appendix A – attachments.

C&I Waste:

Process Operations Summary:

Mixed loads of C&I waste are tipped in the general C&D / C&I reception shed floor and are then subject to the segregation process. Large and bulky items of waste such as sheets of metal, wood, sofas & bed mattresses are initially separated using a grab machine. The remaining C&I waste is feed into the shredder by grab machine. The shredder breaks up the waste and then processes the shredded waste along a number of conveyor belts to separate different forms & types of waste that are comprised within the C&I waste stream. The C&I waste stream is proposed to be process over the same line that all C&D waste is currently processed.

Please refer to C&I process flow diagram figure 1 as identified below.

SRF Waste:

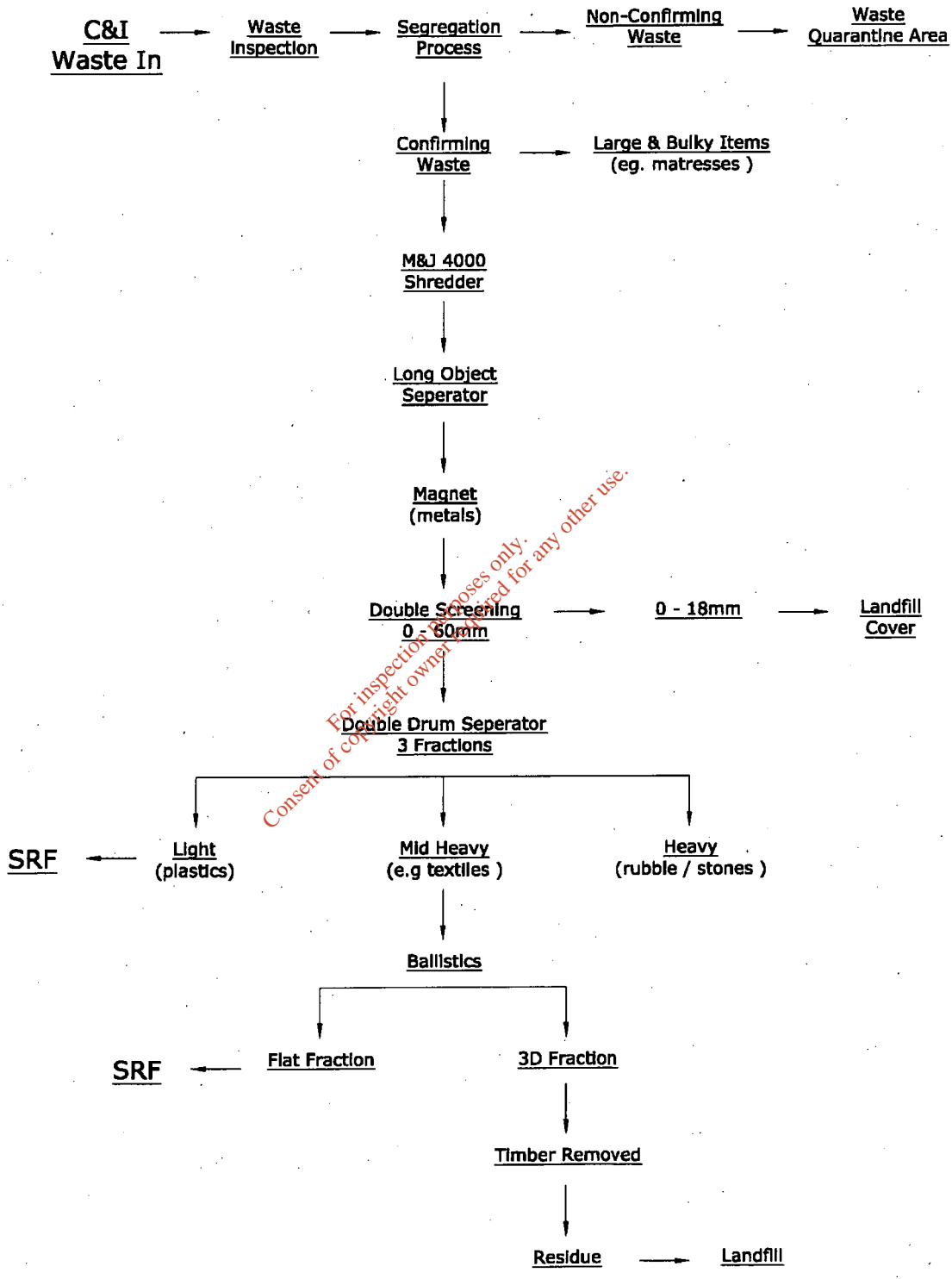
Process Operations Summary:

Bulked loads of SRF material are tipped in the general SRF reception shed floor. The loose SRF material is then fed into a hopper and conveyed to the SRF line that separates any recyclables before being finally shred to <50mm. the shredded SRF material in then fed into the "Goweil Bailer" by loading shovel. The bailed SRF material is transferred to open side trailers where it is delivered to approved destination. (used in the cement kiln industry as a fuel).

Please refer to SRF process flow diagram figure 2 as identified below.

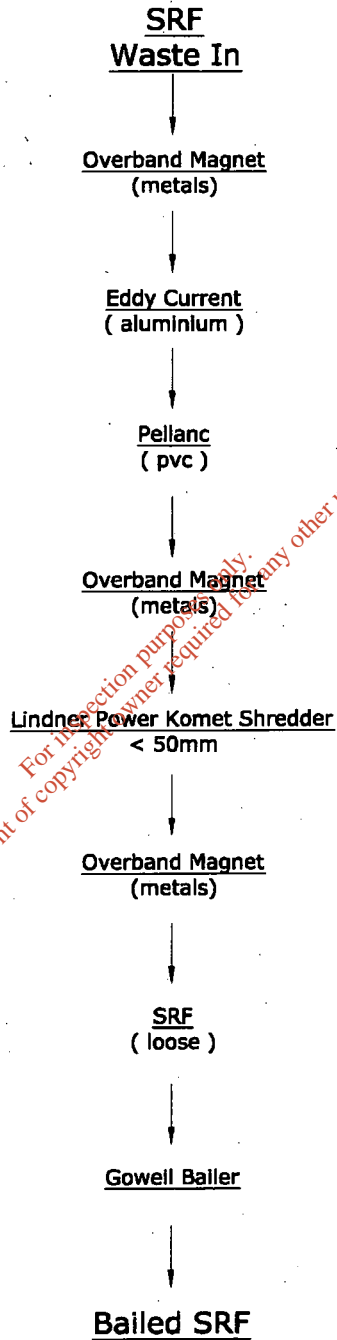
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FIGURE 1
C&I PROCESS FLOW DIAGRAM



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FIGURE 2 SRF PROCESS FLOW DIAGRAM



5. Details of any waste processing equipment and control measures that may be required for acceptance and handling of any proposed waste stream, having regard to the quantities of the waste proposed to be accepted.

OE Response :

All the waste processing equipment required for acceptance and handling of both waste stream categories C&I and SRF already exist and operate at this facility.

C&I Waste:

The following waste plant equipment will be associated with the process of any C&I waste loads accepted:

Exising Liebherr 360° grab machine.
Exising CAT 360° Excavator.
Exising CAT loading shovel.
Exising C&D / C&I process line.

SRF Waste:

The following plant equipment will be associated with the process of any SRF loads accepted:

Exising Liebherr 360° grab machine.
Exising CAT loading shovel.
Exising SRF process line.
Goweil Bailer

Control measures:

All control measures required for the acceptance and handling of the "compatible waste streams" will be in accordance with the EMS Waste Acceptance Procedure (OXEP 01) and the Receipt, Processing and Dispatch of Waste Procedure (OXEP 02). (Appendix A)

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Conclusion :

As a result to the Agency approving the requested Technical Amendment "B" to include the "compatible waste streams "in Table A.1 , Schedule A of the existing Licence 208-01, reduces the possible volume of waste being sent to landfill.

The objective of the EU Landfill Directive (Council Directive 1999/31/EC 1999 on the landfill of waste) is to prevent or reduce the negative effects of landfilling on the environment and human health. The introduction of this Technical Amendment B to our current Licence would conform to this requirement.

The Ballymount waste recovery facility is always targeting itself at the upper level of the waste "hierarchy", in that it promotes the recovery of a product.

It is with this foresight that Oxigen Environmental would also request that the Agency includes the following Condition as part of our Licence:

Research and development pilot projects into recovery options for waste streams may be conducted on site with the approval of the Agency. The types and quantities of waste to be used during the research process will be agreed by the Agency. Each Project shall not commence without the approval of the Agency.

We trust the Agency will look favourably upon this request for a technical amendment to the existing waste licence W0208-01 and request that this be dealt with as a matter of urgency.

Should you have any further queries, please do not hesitate to contact the undersigned.

Yours sincerely,


Brian Moylan

Planning & Compliance
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Appendix A
Attachments

1. Oxygen Environmental letter submitted to the Agency on 19th April 2011.
(ref : 11.EPA208-1 190411MB)
2. Agency letter addressed to Mr. John Clune Operation Manager, dated 22nd July 2011 requesting additional information clarifying a number of matters prior to the Agency making its final decision.
(ref : W0208-01/gc116JH.docx)
3. Section D3 – Materials Management.
Document that formed part of the original Licence application which was submitted to the Agency on 4th August 2004.
4. OXEP 01 Waste Acceptance Procedure.
5. OXEP 02 Receipt, Processing and Dispatch of Waste Procedure.

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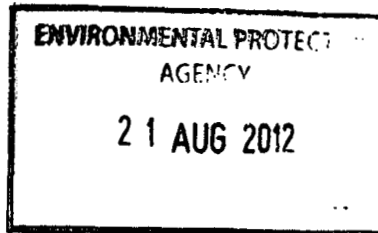


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COPY

Mr. Joe Hunter,
 Environmental Protection Agency,
 Regional Inspectorate,
 Mc Cumiskey House,
 Richview,
 Clonskeagh Road,
 Dublin 14.



19th April 2011

Oxygen Ref: 11. EPA208-1 190411MB

Dear Mr. Hunter,

In relation to waste acceptance with regard to waste categories and quantities set out in Licence 208-01, Oxygen Environmental wishes make a technical amendment to Schedule A of licence. The following table details the changes that Oxygen Environmental wish to make to Schedule A.

Waste Type	Maximum (Tonnes Per Annum)
Household Dry Recyclables	80,000
Commercial (Dry Recyclables)	10,000
Commercial & Industrial	65,000
Industrial Sludges	5,000
Solid Recoverable Fuel (SRF)	2,500
Construction & Demolition	57,500
Hazardous [including healthcare waste]	30,000 [10,000]
Total	250,000

Should you require any further information, please do not hesitate to contact me.

Yours sincerely,

 Maria Byrne
 Environmental Compliance Officer



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Office of
Environmental
Enforcement

Regional Inspectorate, McCumiskey House,
Richview, Clonskeagh Road,
Dublin 14, Ireland.

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Mr. John Clune
Operations Manager
Oxigen Environmental Limited
Merrywell Industrial Estate
Ballymount Road Lower
Dublin 22
REF: Clondalkin

22/07/2011

Our Ref: W0208-01/gc16JH.docx

Dear Mr. Clune

I refer to correspondence dated 19/04/11 (Ref: 11.EPA208-1 190411MB) and to your specific proposal that the Agency accommodate an amendment to *Schedule A.2 Table A.1 Waste Categories and Quantities*.

The Agency does not agree to the proposal as submitted. In order for the Agency to consider this proposal further, the following additional information is required:

- 1) Details to demonstrate how any waste type not currently identified in Table A.1 "*Waste Categories and Quantities*" is compatible with a waste stream identified in that table.
- 2) Details with regard to the nature and source of such "compatible waste streams".
- 3) Details with regard to waste acceptance procedures for such "compatible waste streams".
- 4) Details of handling and processing proposed for these "compatible waste streams". Identify if it is to be processed along with other waste streams currently provided for under Table A.1 "*Waste categories and Quantities*".
- 5) Details of any waste processing equipment and control measures that may be required for acceptance and handling of any proposed waste stream, having regard to the quantities of the waste proposed to be accepted.

Please quote the above reference in future correspondence in relation to this matter. If you have any queries please contact Joe Hunter at the Dublin Regional Inspectorate.

Yours sincerely

Joe Hunter
Inspector
Office of Environmental Enforcement



COPY



Oxygen

working for a cleaner environment

Oxygen Environmental Ltd.

Waste Licensing
Waste Recovery/Disposal Activities
(Other than Landfill Sites)

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Section D3

Materials Management

D.3 MATERIALS MANAGEMENT

The on-site materials handling and management procedures are described in Attachment D.2 and E. Relevant European Waste Catalogue (EWC) codes for the various waste streams are described below.

* denoted waste of a hazardous nature.

Categories of waste recovered on site (with associated EWC code)

- 03 WASTE FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD**
- 03 01 wastes from wood processing and the production of panels and furniture
03 01 05 sawdust, shavings, cuttings, wood, particle board and veneer containing dangerous substances.
03 01 99 wastes not otherwise specified.
- 03 03 wastes from pulp, paper and cardboard production and processing
03 03 07 mechanically separated rejects from pulping of waste paper and cardboard
03 03 08 wastes from sorting of paper and cardboard destined for recycling.
03 01 10 fibre rejects, fibre-, filler – and coating-sludges from mechanical separation.
- 07 WASTES FROM ORGANIC CHEMICAL PROCESSES**
- 07 02 wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13 waste plastic.
- 10 WASTES FROM THERMAL PROCESSES**
- 10 11 waste from the manufacture of glass and glass products
10 11 12 waste glass other than those mentioned in 10 11 11.
- 10 12 wastes from manufacture of ceramic goods, brick, tiles and construction products
10 12 08 waste ceramics, bricks, tiles and construction products (after thermal processing)
- 10 13 wastes from manufacture of cement, lime and plaster and articles and products made from them
10 13 14 waste concrete and concrete sludge
- 12 WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS**
- 12 01 wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01 ferrous metal filings and turnings
12 01 02 ferrous metal dust and particles
12 01 03 non-ferrous metal filings and turnings
12 01 04 non-ferrous metal dust and particles
12 01 05 plastics shavings and turnings
12 01 13 welding wastes
- 15 WASTE PACKAGING; ABSORBANTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
- 15 01 Packaging (including separately collected municipal packaging waste)
15 01 01 Paper and Cardboard Packaging
15 01 02 Plastic Packaging

- 15 01 Packaging (including separately collected municipal packaging waste) (cntd.)**
- 15 01 03 Wooden Packaging
 - 15 01 04 Metallic Packaging
 - 15 01 05 Composite Packaging
 - 15 01 06 Mixed Packaging
 - 15 01 07 Glass Packaging
 - 15 01 09 Textile packaging
- 15 02 absorbents, filter materials, wiping cloths and protective clothing**
- 15 02 03 absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
- 16 WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
- 16 01 end of life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)**
- 16 01 03 End-of-life tyres
- 16 02 wastes from electrical and electronic equipment**
- 16 02 09* transformers and capacitors containing PCBS.
 - 16 02 11* discarded equipment containing chlorofluorocarbons, HCFC, HFC.
 - 16 02 14 discarded equipment other than those mentioned in 16 02 09 to 16 02 13
 - 16 02 16 components removed from discarded equipment other than those mentioned in 16 02 15
- 16 03 off specification batches and unused products**
- 16 03 04 inorganic wastes other than those mentioned in 16 03 03
 - 16 03 06 organic wastes other than those mentioned in 16 03 05
- 16 06 Batteries and accumulators**
- 16 06 01* Lead Batteries
 - 16 06 02* Ni-Cd Batteries
 - 16 06 03* Mercury-containing batteries
 - 16 06 04 Alkaline batteries
 - 16 06 05 Other batteries and accumulators
- 17 CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SIL FROM CONTAMINATED SITES)**
- 17 01 Concrete, bricks, tiles and ceramics**
- 17 01 01 Concrete
 - 17 01 02 Bricks
 - 17 01 03 Tiles and Ceramics
 - 17 01 07 Mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
- 17 02 Wood, glass and plastic**
- 17 02 01 Wood
 - 17 02 02 Glass
 - 17 02 03 Plastic
 - 17 02 04* glass, plastic and wood containing or contaminated with dangerous substances
- 17 03 bituminous mixtures, coal tar and tarred products**
- 17 03 01* bituminous mixture containing coal tar
 - 17 03 02 bituminous mixtures containing other than those mentioned in 17 03 01
 - 17 03 03* coal tar and tarred products
- 17 04 Metals (including their alloys)**
- 17 04 01 copper, bronze, brass
 - 17 04 02 aluminium
 - 17 04 03 lead
 - 17 04 04 zinc

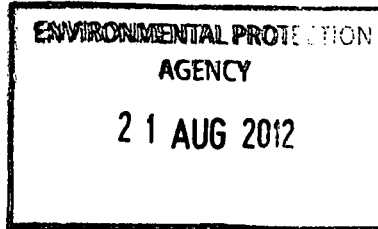
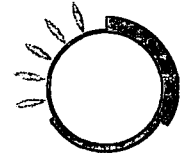
- 18 02 wastes from research, diagnosis, treatment, or prevention of disease involving animals (cntd.)
- 18 02 07* cytotoxic and cytostatic medicines
- 18 02 08 medicines other than those mentioned in 18 02 07
- 19 Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
- 19 08 Wastes from waste water treatment plants not otherwise specified
- 19 08 01 screenings
- 19 08 02 waste from desanding
- 19 10 Wastes from shredding of metal-containing wastes
- 19 10 01 Iron and Steel waste
- 19 10 02 Non-ferrous waste
- 19 12 Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
- 19 12 01 Paper and Cardboard
- 19 12 02 Ferrous metal
- 19 12 03 Non-ferrous metal
- 19 12 04 Plastic and Rubber
- 19 12 05 Glass
- 19 12 06 Wood other than that mentioned in 19 12 06
- 19 12 08 Textiles
- 19 12 09 minerals (for example sand, stones)
- 19 12 10 combustible waste (refuse derived fuel)
- 19 12 11* Other waster (including mixtures of materials) from mechanical treatment of wastes containing dangerous substances.
- 19 12 12 Other waster (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
- 19 13 wastes from soil and ground water remediation
- 19 13 01* solid wastes from soil remediation containing dangerous substances
- 19 13 02 solid wastes from soil remediation other than those mentioned in 19 13 01
- 20 Municipal wastes (Household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
- 20 01 Separately collected fractions (except 15 01)
- 20 01 01 Paper and Cardboard
- 20 01 02 Glass
- 20 01 10 clothes
- 20 01 11 textiles
- 20 01 13* solvents
- 20 01 21* fluorescent tubes and other mercury-containing waste
- 20 01 23* discarded equipment containing chlorofluorocarbons
- 20 01 27* paints, inks, adhesives and resins containing dangerous substances
- 20 01 28 paint, inks, adhesives and resins other than those mentioned in 20 01 27
- 20 01 29* detergents containing dangerous substances
- 20 01 30 detergents other than those mentioned in 20 01 29
- 20 01 31* cytotoxic and cytostatic medicines
- 20 01 32 medicines other than those mentioned in 20 01 31
- 20 01 33* batteries and accumators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
- 20 01 34 batteries and accumulators other than those mentioned in 20 01 33
- 20 01 35* discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
- 20 01 36 discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

20 01	Separately collected fractions (except 15 01) (cntd.)
20 01 37*	wood containing dangerous substances
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 01 41	wastes from chimney sweeping
20 01 99	other fractions not otherwise specified
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 02 02	soil and stones
20 02 03	other non-biodegradeable wastes
20 03	other municipal wastes
20 03 01	mixed municipal waste
20 03 03	street cleaning residues
20 03 99	municipal wastes not otherwise specified.

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OXEP 01 Waste Acceptance Procedure

Oxigen



1 Scope / Purpose

The purpose of this document is to describe the methods involved in ensuring that all waste received at the Ballymount facility is managed appropriately. To ensure that waste is segregated into appropriate streams for recovery/recycling at the Ballymount facility and that unacceptable material at both facilities is quarantined in the correct manner.

2 References

3 Records

Weighbridge Docket

Acceptable Waste List Doc OXE04

Complaints Handling/Corrective Action Form, OXED 103

Rejected Waste Form OXED104

4 Procedures

4.1 Delivery of Skip

On delivery of a skip the List of Acceptable Waste as listed in Doc. OXE04, must be given to the customer by the driver. Doc OXE04 indicates the materials that are accepted into each facility.

4.2 Collection of Skip / Waste Material

4.2.1 The driver arrives on site to collect a full skip / waste material.

4.2.2 The driver quickly inspects the skip / waste material to ensure that all the material is acceptable.

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4.2.3 If the material is found to be acceptable, he/she will take it back to the Waste Transfer Station.

4.2.4 If the material is unacceptable he/she will inform the customer that the materials must be removed before the skip / waste material are taken away.

4.3 On Site Acceptance of the Waste

4.3.1 On entering the Ballymount facility the waste is visually inspected by the weighbridge operator. If the materials are acceptable then the weight and the character of the waste is recorded in the Genesis Weighbridge Software System. If waste type and EWC code cannot be determined at the weighbridge confirmation should be sought from the Environmental Compliance Officer or Facility Manager. The weighbridge should use the CPC Radio System to inform the Processing Supervisor of the load approaching and the classification of the waste therein.

4.3.2 At the Ballymount facility the driver will enter the site by the IN weighbridge, the driver will wait on the weighbridge until all relevant information is recorded, such as, waste type, weight, registration. They will then record this information along with the gross weight in the weighbridge package.

4.3.3 The driver is then directed to the correct tipping area by the Weighbridge Operative, Facility Manager or Processing Manager. When this is completed, the driver will be given the signal to enter the site by the Weighbridge Operative, Facility Manager or Processing Manager by lifting the barrier.

4.3.4 The waste will be tipped onto the inspection floor as directed by the Processing Manager/Supervisor. The material will be levelled out to view all materials in it. If it is acceptable, it will be processed in accordance with procedure OXEP 02 Receipt, Processing and Dispatch of Waste Procedure. If it is unacceptable it will be dealt with in accordance with section 4.4 of this procedure. CPC Radio (Walkie Talkie) system should be used to confirm waste type to the weigh bridge once waste has been tipped.

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4.3.5 After tipping, the driver will proceed to the OUT bridge with the SAME cab unit and container and will remain on the OUT bridge until the empty weight is taken. The driver will be given the signal to leave the site when the Weighbridge Operator, Facility Manager or Processing Manager lifts the barrier.

4.4 Non Conforming Waste.

4.4.1 If the material presented is found to be unacceptable at any time after it has entered the site it is immediately loaded back into the container in which it arrived. If this is not possible, or if the unacceptable waste makes up only a fraction of the load, it shall be separated and placed in the waste quarantine area. The Processing Manager/Supervisor will inform the Environmental Manager/Compliance Officer of any such incident and a Complaints Handling/Corrective Action Form, OXED 103 shall be completed by the Weighbridge Operative or Environmental Compliance officer.

4.4.2 An appropriate and approved facility for the recovery or disposal of the material will be identified immediately and the materials will be sent there to be properly dealt with at the earliest possible time. Or where possible returned immediately to the customer with a Rejected Load Form doc OXED 104.

4.4.3 The customer will be notified as to the offending material that has been found in the skip or bin.

4.4.4 Where non conforming waste types are found in the general waste pile it is not always possible to ascertain which load they originated from. In this case, any offending material shall be removed and quarantined to the appropriate quarantine container. Non conforming waste must never be loaded into the trommel.

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5 Persons Responsible

Drivers (HGV/LGV/Machine)
Weighbridge Operative
Facility Manager
Processing Manager
Environmental Compliance Officer
Supervisor

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OXEP 02 Receipt, Processing and Dispatch of Waste Procedure

Oxigen



1 Scope / Purpose

The purpose of this document is to describe the methods involved in the receipt, processing and dispatch of waste. This document refers to the reception of waste at the Ballymount facility.

2 References

Oxigen Environmental Safety Statement
Accident Prevention Policy

3 Records

Acceptable Waste List, Doc OXE 04
EPA Approved Destinations List, Doc OXE 05

4 Procedures

4.1 Receipt of Waste

4.1.1 Waste may be delivered to the facilities by Oxigen Environmental drivers or by direct customer delivery. The customer must seek permission from the Facility Manager prior to any waste delivery and the Facility Manager must ensure that they have a waste collection permit.

4.1.2 Waste shall only be received in Oxigen Environmental skips, containers or in approved customer vehicles and containers. Where skips are collected from

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customers, the driver of the collection vehicle shall perform a cursory inspection of the skip as per the Waste Acceptance Procedure, OXEP 01.

4.1.3 Waste shall only be accepted by Oxigen Environmental when adequately covered or netted. It is the responsibility of the Driver of the vehicle to ensure this is done and the responsibility of the Facility Manager and Weighbridge Operative to ensure that each delivery enters in this manner.

4.1.4 ALL vehicles delivering waste to Oxigen Environmental shall park on the weighbridge for docket generation as per OXEP 01.

4.1.4 Please refer to procedures of Waste Acceptance OXEP01.

4.1.5 The load is directed to the tipping and inspection area of the appropriate processing shed where it is further inspected upon tipping to ensure accurate recording of waste type. Any loads that have arrived already source segregated are immediately transferred to the dedicated segregated bay and bulked up prior to transfer off site for further recovery or recycling. Any unacceptable or non-conforming waste types are transferred to a quarantine area and depending on makeup are sent to, or collected by, an appropriate waste facility.

4.1.6 Once tipped, the driver shall return to the weighbridge and report to the weighbridge operator for issuance and signing of the weighbridge dockets. After the weighing is complete, the weighbridge operative will lift the barrier and allow the vehicle to exit.

4.2 Processing of Waste

4.2.1 Waste shall be processed in accordance with Oxigen Environmental Safety Statement and Accident Prevention Policy.

4.2.2 Waste shall only be sorted and/or segregated by trained operatives wearing and using the correct personal protective equipment.

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4.2.3 C&D / C&I Waste

Mixed loads of C&D and C&I waste are tipped in the general waste pile and are then subject to the segregation process. Large and bulky items of waste such as sheets of metal and wood are initially separated using a grab machine. The machine then crunches the general waste and feeds it into the trommel. The trommel further breaks up the waste and finer particles are removed through punch screens. Metals are moved from the waste by a revolving magnet. The remaining waste is then conveyed over various lines to sort and separate different waste types which are then removed to segregated bays.

Dry Recycling

Dry Recycling material is tipped in the dry recycling processing shed. It is then pushed up onto the conveyor belt of the recycling plant itself. As the material passes along the line it is subject to separation over a number of screens, a magnet, eddie current, optical laser and eventually a picking line. The separate material types are then baled, these consist of cardboard, paper, plastic bottles, aluminium cans, steel cans and Tetra-Pak. The bales of material are bulked and stored before being shipped out for further recycling.

Hazardous Waste

Hazardous waste is inspected and unloaded in shed number D10. It is then stored in sheds D8 and D9 prior to shipping.

4.2.4 It shall be the policy of Oxigen Environmental to separate, recover and recycle as much waste as is reasonably possible at the Ballymount Facility without entailing excessive cost. Some of the residue from the dry recycling and the C&D line that is deemed suitable by the Facility Manger will be put through the SRF processing plant. All other residue that is not suitable for SRF will be consigned to landfill or other approved waste facility as listed on Doc OXE 05.

4.2.5 Processed separate waste fractions shall be loaded into the designated open top ejector trailers, closed top ejector trailers and roll-on/roll-off skips respectively as directed by the Facility Manager, Processing Manager or Processing Supervisor.

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4.2.6 Prior to loading any trailer or container, the Facility Manager, Processing Manager or Processing Supervisor shall instruct a driver to take the container to the weighbridge with a shunting vehicle, where the empty weight will be recorded. Once loaded, the container will be taken back to the weighbridge with the same shunting vehicle where the full weight will be recorded.

4.3 Dispatch

4.3.1 At the earliest convenient time, the Facility Manager or Supervisor shall instruct a driver to take full loads to appropriate and approved destinations for that waste type. Should no driver be available the supervisor shall consult the Facility Manager or Supervisor to make alternative arrangements.

4.3.2 Once the driver has attached the truck unit to his assigned container, he shall drive onto the weighbridge, and consult the weighbridge operative for docket generation.

4.3.3 The weighbridge operative shall re-confirm with the driver the destination of his load as per the EPA Approved Destinations List, Doc OXE 05 and issue the driver with the appropriate paper work for that load.

4.3.4 The Facility Manager will inform the weighbridge operatives with updates to the approved suppliers list.

4.3.5 All loads leaving the Facility will be appropriately covered and will not be issued with paper work or instructed to leave without appropriate cover.

5 Persons Responsible

Weighbridge Operator

Facility Manager or Supervisor

All drivers

Skip Hire Manager

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