

Ann Kehoe

To: Ewa Babiarczyk
Subject: RE: Clean Ireland- W0253-01 New 1st Schedule EPA Acts 1992-2013

From: Helen Behan [<mailto:Helen.Behan@bnm.ie>]
Sent: 12 August 2013 13:04
To: Ewa Babiarczyk
Cc: mkerin@cleanirl.com; paddy hedigan
Subject: Clean Ireland- W0253-01 New 1st Schedule EPA Acts 1992-2013

Dear Eva,

I am providing the response on behalf of Clean Ireland for the Waste Registration form in relation to the IED as transposed into Irish Regs.

I have reviewed all the 1st Schedule and concluded the none of the activities apply to the existing or proposed activities that are subject of the Waste Licence application.

There are some items however I would like to have clarity on before I return the form:

1st Schedule 11.1

My understanding of 11.1, which is not an activity, and relates to waste arising for other activities in the 1st Schedule. Can you confirm that this should not normally be included and no similar waste licensees are including this?

1st Schedule 11.2

CIRL have applied for 7 days under their operating hours- are you able to advise whether the 7 days are included in the proposed determination or a reduced days for processing? This will affect the tonnes per day (2,600 applied for) of hazardous waste under 11.2. However, even at 6 days of operation the application would relate to 8.5 tonnes per day so CIRL would still not fall under this activity.

1st Schedule 11.4 (b)

Can you confirm that (b) (i) should only related to biological treatment and not include tonnes for MBT? For composting only, 13,500tpa has been applied for which is under the threshold at c. 40tpd. However, if we have to include mechanical treatment of MSW this will push the activity over the threshold to 91tpd. It is my opinion that mechanical treat part of MBT would not be included and CIRL will not fall under this activity. Perhaps you have some knowledge of how your other waste licensees are approaching this.

Finally, all activities under 3rd & 4th Schedule remain unaffected if no activities fall under new 1st Schedule?

We are due to have the return in by this Thursday 15th August, if you could advise pls before then.

Kind Regards,

Helen 045 439376

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