



ENVIRONMENT
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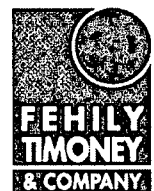
BORD NA MONA PLC

**OBJECTION TO THE PROPOSED DECISION ISSUED FOR
THE DRUMMAN MATERIALS RECYCLING & WASTE
TRANSFER FACILITY W0275-01**

DECEMBER 2013

BORD NA MÓNA 

PLC



BORD NA MONA PLC

OBJECTION TO THE PROPOSED DECISION ISSUED FOR THE DRUMMAN MATERIALS RECYCLING & WASTE TRANSFER FACILITY W0275-01

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Abstract: This document presents Bord na Móna PLC's objection to the Proposed Decision (PD) for the Drumman Materials Recycling and Waste Transfer facility W0275-01.

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1. INTRODUCTION

This document presents the objections of Bord na Móna PLC to a number of Conditions, Schedules and other issues presented in the Proposed Decision (PD) for the Drumman Materials Recycling and Waste Transfer Facility W0275-01.

As per the requirements of Section 42(4) of the Waste Management Act 1996, as amended:

- this objection is made in writing
- the name and address of the objector is:

Bord na Móna PLC
Main Street
Newbridge
Co. Kildare

- the subject matter to which the objection is made is identified in the following sections i.e. the respective Conditions, Schedules or other issues of the PD
- the grounds for objection for the respective Conditions, Schedules or other issues of the PD are identified in the following sections and
- the appropriate fee has been provided to the Agency under separate cover.

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2. CONDITIONS, SCHEDULES AND OTHER AREAS OF THE PD TO WHICH THE OBJECTION RELATES

2.1 Introduction

The following sentence is contained within the Introduction:

Accepted waste will be temporarily stored, processed as might be required and transported off-site for further recovery of disposal.

2.1.1 Grounds for Objection

It is suggested that this sentence contains a typo and should read:

Accepted waste will be temporarily stored, processed as might be required and transported off-site for further recovery or disposal.

2.2 Part 1 Schedule of Activities Licenced

Class D14 is identified as follows:

Class D14 Repackaging prior to submission to any of the operations numbered D1 and D13.

2.2.1 Grounds for Objection

It is suggested that this sentence contains a typo and that the description of Class D14 should read:

Class D14 Repackaging prior to submission to any of the operations numbered D1 to D13.

2.3 Conditions 1.5.3

Condition 1.5.3 reads:

1.5.3 No waste shall be accepted nor site operations carried out on Sundays and public holidays unless otherwise agreed by the Agency.

2.3.1 Grounds for Objection

The Applicant has no objection to waste acceptance or site operations not being carried out on a Sunday. However, it is considered that the extension of this restriction to Public Holidays is excessive and impractical. As a waste transfer and material processing facility, the operational availability of the facility has direct impact on the waste collections carried out in the wider vicinity of the facility.

This restriction, as currently proposed, has potential to impact waste collection, during the Christmas period in particular. For example, when either Christmas Day or St Stephen's Day falls on a Saturday, Sunday or Monday, there would be three consecutive days when the facility would be unable to accept waste for processing and/or transfer to other facilities which (appropriately) are not similarly restricted.¹ Given the rural location of the facility and the lack of nearby sensitive receptors, it is considered that public amenity would not be negatively impacted were the facility to be operational on Public Holidays.

This objection should not impact on the timelines provided in Condition 6.18.1, reflecting the fact that some third party facilities may choose not to operate on Public Holidays.

¹ Drehid Waste Management Facility, W0201-01, W0201-03
Drehid Waste Management Facility, W0201-02: Applicant's objection to PD / Technical Amendment Request
Drehid MBT Facility (PD) W0283-01

It is suggested that Condition 1.5.3 be reworded as follows:

- 1.5.3 *No waste shall be accepted nor site operations carried out on Sundays unless otherwise agreed by the Agency.*

2.4 Condition 3.2.1

Condition 3.2.1 reads:

- 3.2.1 *The licensee shall, within one month of the date of grant of this licence, provide a Facility Notice Board on the facility so that it is legible to persons outside the main entrance to the facility. The minimum dimensions of the board shall be 1200 mm by 750 mm. The notice board shall be maintained thereafter.*

2.4.1 Grounds for Objection

It is submitted that the erection of a Facility Notice Board (containing information such as normal hours of opening and operation, and instructions on where environmental information can be obtained) prior to commencement of waste acceptance at the facility would be misleading to the public. Given the uncertain timelines involved in the detailed design, contractor procurement and construction of the facility, it is considered that the requirement for provision of the Facility Notice Board within one month of the date of grant of this licence is inappropriate.

It is considered that provision of the Facility Notice Board should be related to the commencement of waste acceptance at the facility.

It is submitted that Condition 3.2.1 should read:

- 3.2.1 *The licensee shall, prior to commencement of waste acceptance at the facility, provide a Facility Notice Board on the facility so that it is legible to persons outside the main entrance to the facility. The minimum dimensions of the board shall be 1200 mm by 750 mm. The notice board shall be maintained thereafter.*

2.5 Condition 3.3

Condition 3.3 reads:

- 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.*

2.5.1 Grounds for Objection

It may not be possible to fully comply with such a condition in its current form as it may not be practical and/or technically feasible to install such equipment as may be required by the Agency. Hence, it is considered that Condition 3.3 should include a provision for mutually agreeing the equipment required, as is the case with other conditions.

It is submitted that Condition 3.3 should read:

- 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 agreed with the Agency. All such equipment shall be consistent with the safe operation of all sampling and monitoring systems.*

2.6 Condition 3.4

Condition 3.4 reads:

- 3.4 *In the case of composite sampling of aqueous emissions from the operation of the facility, a separate composite sample or homogeneous sub-sample (of sufficient volume as advised) shall be refrigerated immediately after collection and retained as required for EPA use.*

2.6.1 Grounds for Objection

Given that it would not be practicable to retain and refrigerate water samples on site indefinitely, it is submitted that Condition 3.4 should include a time line for the retention of samples on site.

It is submitted that Condition 3.4 should read:

- 3.4 *In the case of composite sampling of aqueous emissions from the operation of the facility, a separate composite sample or homogeneous sub-sample (of sufficient volume as advised) shall be refrigerated immediately after collection and retained, for a minimum period of 2 months, for EPA use.*

2.7 Condition 3.7.1

Condition 3.7.1 reads:

- 3.7.1 *Security and stockproof fencing and gates shall be installed and maintained. The base of the fencing shall be set in the ground. Subject to the implementation of the restoration and aftercare plan and to the agreement of the Agency, the requirement for such site security may be removed.*

2.7.1 Grounds for Objection

In the interests of commonality in language throughout the licence, and given that Condition 10.2 refers to a Decommissioning Management Plan (DMP), it is submitted that Condition 3.7.1 should read:

- 3.7.1 *Security and stockproof fencing and gates shall be installed and maintained. The base of the fencing shall be set in the ground. Subject to the implementation of the Decommissioning Management Plan and to the agreement of the Agency, the requirement for such site security may be removed.*

2.8 Condition 3.7.2

Condition 3.7.2 reads:

- 3.7.2 *The licensee shall install a CCTV system which records all truck movement into and out of the facility. The CCTV system shall be operated at all times and copies of recording kept on site and made available to the Agency on request.*

2.8.1 Grounds for Objection

The indefinite retention of CCTV recordings is considered impractical and it is proposed that a timeline be introduced to this condition, in keeping with other licences e.g. W0283-01.

It is submitted that Condition 3.7.2 should read:

- 3.7.2 *The licensee shall install a CCTV system which records all truck movement into and out of the facility. The CCTV system shall be operated at all times and copies of recording kept on site for a period to be agreed with the Agency. Copies of recordings shall be made available to the Agency on request.*

2.9 Condition 3.8.2

Condition 3.8.2 reads:

3.8.2 *The licensee shall provide and maintain an impermeable concrete surface in all areas of the facility. The surfaces shall be concreted and constructed to British Standard 8110 or an alternative as agreed by the Agency. The licensee shall remedy any defect in concrete surfaces within five working days.*

2.9.1 Grounds for Objection

Drawings submitted with the waste licence application indicate a number of areas within the facility boundary that will be either landscaped or consist of impermeable paving i.e. car parking area. It is not intended to concrete these areas, primarily as a surface water attenuation measure, as well as a visual screening/softening measure.

To this end, it is submitted that Condition 3.8.2 should read:

3.8.2 *The licensee shall provide and maintain impermeable concrete surfaces in areas of the facility used for the handling and storage of waste and emissions. The surfaces shall be concreted and constructed to British Standard 8110 or an alternative as agreed by the Agency. The licensee shall remedy any defect in concrete surfaces within five working days.*

2.10 Condition 3.10

Condition 3.10 reads:

3.10 *Construction and Demolition Waste Recovery Area*

3.10.1 *The licensee shall provide and maintain a construction and demolition waste recovery area. This infrastructure shall at a minimum comprise the following:*

- (i) an impermeable concrete slab;*
- (ii) collection and disposal infrastructure for all run-off;*
- (iii) appropriate bunding to provide visual and noise screening;*

3.10.2 *All stockpiles shall be adequately contained to minimise dust generation.*

3.10.3 *The licensee shall implement measures to minimise dust generation at this facility and shall as instructed by the Agency install a sprinkling irrigation system for the control of dust nuisance from the facility. Any remedial works necessary to control dust must be implemented within a time-scale to be agreed by the Agency.*

3.10.4 *Only construction and demolition waste shall be accepted at this area. Wastes that are capable of being recovered shall be separated and shall be stored temporarily in this area in advance of being subjected to other recovery activities at the facility or transport off the facility.*

2.10.1 Grounds for Objection

It is considered that Condition 3.10 does not accurately reflect the proposed operation of the facility, as outlined in the information submitted with the application. The facility Waste Reception & Processing Building will be divided into 3 distinct areas: the materials recovery area, the waste transfer area the biowaste reception area. Condition 3.12 of the licence addresses the biowaste storage area.

Construction and demolition (C&D) waste will be accepted within the waste transfer area, along with residual 'black bag' waste, where gross recovery will be undertaken on the C&D material, prior to being bulked up and transferred offsite. Therefore, it is considered more appropriate to refer to the waste transfer area as a whole, rather than specify the construction and demolition section within the waste transfer area.

For information, a floor plan drawing (Drawing Number LW09-660-04-100-004), submitted as part of the planning process, is included in Appendix 1 to this document to aid in visualising building layout.

Given that C&D waste will be accepted within a fully enclosed area of the Waste Reception & Processing Building, the requirements of Conditions 3.10.1 & 3.10.2 are provided for within the building.

Condition 3.10.3 requires the minimisation of dust generation, measures for which will be implemented through the facility EMS. However, the potential requirement for the installation of a sprinkler system is considered excessive, given:

- the fully enclosed nature of the Waste Reception & Processing Building and the nature of operation being carried out in the waste transfer area
- the operation of dust extraction within the Waste Reception & Processing Building i.e. negative air extraction to dust filtration
- the implementation of dust management measures and monitoring regime as required in Conditions 3.25, 4.6 & 6.18
- the water minimisation measures required in Condition 7.3

It is submitted that Condition 3.10 should read as follows:

3.10 Waste Transfer Area

3.10.1 The licensee shall provide and maintain a fully enclosed waste transfer area for the acceptance, processing and storage of waste types identified in Schedule A2 of this licence.

3.10.2 Measures to minimise dust generation in this area as outlined in the relevant conditions of this licence, shall be undertaken. Any further remedial works considered necessary to control dust shall be agreed with the Agency and must be implemented within a time-scale to be agreed by the Agency.

3.10.4 Wastes accepted in this area that are capable of being recovered shall be separated and shall be stored temporarily in this area in advance of being subjected to other recovery activities at the facility or transported from the facility.

2.11 Condition 3.12 (iii)

Condition 3.12 (iii) reads:

3.12 (iii) Air handling and odour abatement equipment including bio-filter volume/capacity and odour abatement equipment provided on the basis of 100% standby capacity;

2.11.1 Grounds for Objection

The provision of air handling and odour abatement equipment on the basis of 100% standby capacity is considered impracticable and indeed unnecessary to prevent an impairment of, or an interference with amenities or the environment beyond the facility boundary. The extent of the additional infrastructure associated with the provision of 100% standby capacity could potentially render the project commercially unviable.

For clarity, the air handling equipment and odour abatement equipment proposed at this juncture and to be fully defined during detailed design are:

- Negative air extraction within all areas of the Waste Reception & Processing Building i.e. waste transfer area, recyclables processing area and biowaste storage area, and the direction of:
 - air from the waste transfer area and recyclables processing area to a dust filtration system and
 - air from the biowaste storage area to biofiltration

The use of dust extraction and biofiltration is considered BAT in keeping with the Agency publication "Final Draft BAT Guidance Note on Best Available Techniques for the Waste Sector: Waste Transfer and Materials Recovery".

However, the provision of 100% standby capacity is not identified as being a BAT requirement in this publication.

The dust and odour treatment technologies will be treating ambient air from within the Waste Reception & Processing Building. No process air e.g. air from within a composting system, will be treated. In the event of a malfunction of any of this equipment, potential impacts on the environment in the vicinity would be temporary in nature, and negligible in effect, given the remote location of the facility with respect to potential sensitive receptors and the 'low load' nature of the air streams being treated. To this end, extra duty capacity is not warranted. Emergency maintenance call outs will provide sufficient back up and support to the operation of these systems.

It is submitted that Condition 3.12 (iii) be deleted.

2.12 Condition 3.16

Condition 3.16 reads:

3.16 Silt Traps and Oil Separators

The licensee shall, within six months of date of grant of this licence, install and maintain silt traps...

2.12.1 Grounds for Objection

Given the uncertain timelines involved in the detailed design, contractor procurement and construction of the facility, it is considered that the requirement for the installation of silt traps and interceptors within six months of the date of grant of this licence is inappropriate.

It is suggested that Condition 3.16 should read:

3.16 Silt Traps and Oil Separators

The licensee shall, prior to commencement of waste acceptance at the facility, install and maintain silt traps

2.13 Condition 3.18

Condition 3.18 reads:

3.18 *All pump sumps, storage tanks, lagoons or other treatment plant chambers from which spillage of environmentally significant materials might occur in such quantities as are likely to breach local or remote containment or separators, shall be fitted with high liquid level alarms (or oil detectors as appropriate) within six months from the date of grant of this licence.*

2.13.1 Grounds for Objection

Given the uncertain timelines involved in the detailed design, contractor procurement and construction of the facility, it is considered that the requirement for the installation of high level liquid alarms in pump sumps, storage tanks, lagoons etc. within six months of the date of grant of this licence is inappropriate.

It is suggested that Condition 3.18 should read:

- 3.18 *All pump sumps, storage tanks, lagoons or other treatment plant chambers from which spillage of environmentally significant materials might occur in such quantities as are likely to breach local or remote containment or separators, shall be fitted with high liquid level alarms (or oil detectors as appropriate) prior to waste acceptance at the facility.*

2.14 Condition 3.21

Condition 3.21 reads:

- 3.21 *The licensee shall, within three months of the date of grant of this licence, install in a prominent location on the site a wind sock, or other wind direction indicator, which shall be visible from the public roadway outside the site.*

2.14.1 Grounds for Objection

Given the uncertain timelines involved in the detailed design, contractor procurement and construction of the facility, it is considered that the requirement for the installation of a wind direction indicator within three months of the date of grant of this licence is inappropriate.

It is suggested that Condition 3.21 should read:

- 3.21 *The licensee shall, prior to the commencement of waste acceptance at the facility, install in a prominent location on the site a wind sock, or other wind direction indicator, which shall be visible from the public roadway outside the site.*

2.15 Condition 3.23

Condition 3.23 reads:

3.23 *Weighbridge and Wheel Cleaners*

3.23.1 *The licensee shall provide and maintain a weighbridge and wheel cleaners at the facility.*

3.23.2 *The wheel cleaners shall be used by all vehicles leaving the facility as required to ensure that no trade effluent/storm water or waste is carried off-site. All water from the wheel cleaning area shall be directed to the trade effluent drainage network.*

3.23.3 *The wheel-wash shall be inspected on a daily basis and drained as required. Silt, stones and other accumulated material shall be removed as required from the wheelwash and disposed of appropriately.*

2.15.1 Grounds for Objection

It is assumed that the reference to "wheel cleaners" and "wheel wash" in this condition refer to the same type of unit i.e. a surface mounted wheel washing system.

A unit of this nature was not proposed in the details supplied as part of the waste licence application, as the use of wheelwash systems is not considered typical for dry materials recycling facilities and/or waste transfer facilities.

For clarity, the term "trade effluent/stormwater" in relation to this licence is taken to refer to leachate that may be generated within the waste transfer elements of the Waste Reception and Processing Building.

While the applicant does not disagree with the contention of the condition, i.e. that wheelwashing systems prevent trade effluent/stormwater being carried offsite for certain facilities, it contends that it is unnecessary at the Drumman facility given the nature of materials to be accepted at the facility.

Furthermore, the condition currently references the "trade effluent drainage network" which is assumed to refer to the foul water treatment pipework to the proposed WWTP. The addition of wastewater from a unit of this nature may require reconsideration of the WWTP sizing during detailed design, such that an increased load is realised, which may impact on the ability to achieve the emission volume limits stipulated in Schedule B.2.

It is proposed that Condition 3.23 be reworded as follows:

3.23 *Weighbridge and Wheel Cleaners*

The licensee shall provide and maintain a weighbridge at the facility. The requirement for the installation of a wheelwashing system will be reviewed on an annual basis and agreed if necessary with the Agency.

2.16 Condition 3.26.1

Condition 3.26.1 reads:

3.26.1 *The licensee shall carry out a risk assessment to determine if the activity should have a fire-water retention facility. The licensee shall submit the assessment and a report to the Agency on the findings and recommendations of the assessment within six months of the date of grant of this licence.*

2.16.1 Grounds for Objection

Given the uncertain timelines involved in the detailed design, contractor procurement and construction of the facility, it is considered that the requirement for the submission of the fire water risk assessment within six months of the date of grant of this licence is inappropriate.

It is suggested that Condition 3.21 should read:

3.26.1 *The licensee shall carry out a risk assessment to determine if the activity should have a fire-water retention facility. The licensee shall submit the assessment and a report to the Agency on the findings and recommendations of the assessment prior to the commencement of waste acceptance at the facility*

2.17 Condition 3.26.3

Condition 3.26.3 reads:

3.26.3 *In the event of a fire or a spillage to storm water, the site storm water shall be diverted to the containment pond. The licensee shall examine, as part of the response programme in Condition 3.26.2 above, the provision of automatic diversion of storm water to the containment pond. The licenses shall have regard to any guidelines issued by the Agency with regard to firewater retention.*

2.17.1 Grounds for Objection

To clarify, stormwater generated at the facility will pass through the facility stormwater attenuation pond, prior to discharge to the receiving surfacewater. In the event of a fire or a spillage to stormwater, the stormwater attenuation pond will act as a containment pond, with automatic closing of valves controlling discharge in the event of an emergency or detection of exceedence of relevant trigger values.

It is submitted that Condition 3.26.3 should read:

3.26.3 *In the event of a fire or a spillage to storm water, the site storm water shall be contained in the stormwater attenuation pond. The licensee shall examine, as part of the response programme in Condition 3.26.2 above, the provision of automatic isolation of the stormwater attenuation pond. The licensee shall have regard to any guidelines issued by the Agency with regard to firewater retention.*

2.18 Condition 6.6

Condition 6.6 reads:

6.6 *The licensee shall ensure that groundwater monitoring well sampling equipment is available/installed on-site and is fit for purpose at all times. The sampling equipment shall be to Agency specifications.*

2.18.1 Grounds for Objection

It is agreed that the equipment that is used on site needs to be fit for purpose but requiring it to be to Agency specifications could result in a prohibitively onerous requirement on the Applicant. It is submitted that the requirement to provide 'fit for purpose' equipment is in itself sufficient.

It is suggested that Condition 6.6 should read:

6.6 *The licensee shall ensure that groundwater monitoring well sampling equipment is available/installed on-site and is fit for purpose at all times.*

2.19 Condition 6.13 & Schedule C.5

Condition 6.13 reads:

6.13 Noise

The licensee shall carry out a noise survey of the site operations annually. The survey programme shall be undertaken in accordance with the methodology specified in the 'Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)' as published by the Agency.

Schedule C.5 presents the following:

C.5 Noise Monitoring

Location	Measurement	Frequency
N1, N2 (as per Drawing Number LW09-660-04-300-005 Rev B or as may be otherwise agreed/directed under Condition 6.8)	Daytime dB L _{A,r,T} (30 minutes)	Quarterly
	Evening dB L _{A,r,T} (30 minutes)	
	Night-time dB L _{Aeq,T} (15 – 30 minutes)	
Period	Minimum Survey Duration	
Daytime	4 hour survey with a minimum of 3 sampling periods at each noise monitoring location. ^{Note 1}	
Evening-time	2 hours survey with a minimum of 1 sampling period at each noise monitoring location.	
Night-time ^{Note 1}	3 hour survey with a minimum of 2 sampling periods at each noise monitoring location.	

Note 1: Night-time measurements should be made between 2300hrs and 0400hrs, Sunday to Thursday, with 2300hrs being the preferred start time.

Note 2: Sampling period is to be the time period T stated within the relevant licence. Typically this will be either 15 minutes or 30 minutes in duration. This applies to day, evening and night time periods.

2.19.1 Grounds for Objection

It is considered that there a conflict between Condition 6.13 and Schedule C.5 of the PD. Condition 6.13 requires the licensee to carry out a noise survey annually. However, Schedule C.5 indicates a frequency of quarterly monitoring.

A similar condition is contained in 6.15 of W0283-01, yet no frequency is stipulated in the relevant schedule.

Given the rural location of the facility and the outcomes of the noise modeling carried out and submitted in Section E.5 of the Attachments with the waste licence application, which identified no noise impact at any of the monitoring locations assessed, it is considered that a requirement for quarterly monitoring is excessive and unwarranted.

It is submitted that Condition 6.13 of this licence be maintained as it is and that the reference to frequency in Schedule C.5 be amended to 'Annually'.

In addition, it is submitted that the information in relation to 'Period' and 'Minimum Survey Duration' in Schedule C.5 has been superceded by the Table 5 provided in the EPA response to Q.3 in its FAQs on the 'Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)': For convenience, this Table 5 is provided below.

Table 5 Recommended Minimum Survey Durations

Period	Minimum Survey Duration
Daytime (07:00 to 19:00hrs)	A minimum of 3 sampling periods ¹ at each noise monitoring location.
Evening (19:00 to 23:00hrs)	A minimum of 1 sampling period at each noise monitoring location.
Night-time ² (23:00 to 07:00hrs)	A minimum of 2 sampling periods at each noise monitoring location.

- viii. Sampling period is to be the time period T stated within the relevant licence. Typically this will be either 15 minutes or 30 minutes in duration. This applies to day, evening and night time periods.
- ix. Night-time measurements should normally be made between 23:00hrs and 04:00hrs, Sunday to Thursday, with 23:00hrs being the preferred start time.

This table removes the requirement for a 4 hour, 2 hour and 3 hour surveys during day, evening and night times, respectively. It is considered that the inclusion of a 'Period' and 'Minimum Survey' duration in accordance with Table 5 is warranted in Schedule C.5.

In summary, it is submitted that:

- Condition 6.13 of this licence be maintained as it is
- the reference to frequency in Schedule C.5 be amended to 'Annually'
- the 'Period' and 'Minimum Survey Duration' reflect Table 5 of the EPA FAQ response i.e. the removal of the requirement for a 4 hour, 2 hour and 3 hour surveys during day, evening and night times, respectively

2.20 Condition 6.14.1

Condition 6.14.1 reads:

6.14.1 *A visual examination of storm water discharges shall be carried out daily. A log of such inspections shall be maintained.*

2.20.1 Grounds for Objection

As the discharge from the stormwater attenuation pond is linked to rainfall, there will be days when no discharge occurs. It is therefore submitted that weekly visual examination intervals are more appropriate.

It is suggested that Condition 6.14.1 is reworded to:

A visual examination of the storm water discharges shall be carried out weekly. A log of such inspections shall be maintained.

2.21 Condition 6.14.2

Condition 6.14.2 reads:

6.14.2 Unless otherwise agreed by the Agency, the trigger levels for storm water discharge to surface water at SW2 are:

- (i) Suspended Solids 25 mg/l*
- (ii) BOD 2.6 mg/l*
- (iii) Total Ammonia (as N) 0.14 mg/l*

2.21.1 Grounds for Objection

The reference to SW2 in this condition is incorrect. Please refer to Section 2.32 of this report for more detail.

The Inspectors Report prepared as part of the assessment of this licence application states the following:

"However, the applicant stated that the WWTP will be designed to achieve concentration of 25 mg/l for this parameter, which is below the limit for suspended solids set in the Urban Waste Water Treatment Regulations (35 mg/l). Accordingly, it is proposed in the RD to set the ELV for suspended solids at 25 mg/l."

While it is the case that the WWTP unit to be installed at the facility will have a suspended solids design value of 25mg/l, this is not and cannot be a guaranteed value by the unit manufacturers, as there will undoubtedly be isolated instances where this value may be exceeded.

To this end, it is considered excessive to impose a trigger limit value of 25mg/l when the Urban Waste Water Treatment Regulations stipulate 35mg/l, especially when the resultant impact of exceedence of a trigger value is the recording of an incident and the requirement for actions to be taken by the licensee.

In the event of exceeding the proposed limit value of 25mg/l, with, for example 28 mg/l, the question is asked – what does an exceedence identify? It identifies that stormwater that is 'cleaner' than the UWWT regulations require, in terms of suspended solids, has been discharged to the receiving water. It is suggested that this would not warrant remedial actions by the licensee.

It is proposed that the suspended solids trigger levels be revised to 35 mg/l, in keeping with the UWWT Regulations and as provided for in other licences.

Furthermore, regarding the trigger limit for Total Ammonia, it has been identified in the information submitted as part of the waste licence application, that the Boyne Upper WMU in which the Mongagh River is located, displays elevated, naturally occurring ammonia due to the surrounding peatlands. This is concurred with in the Inspectors Report.

It is contended that, for this reason, the discharge of stormwater to the receiving Mongagh River with Total Ammonia levels in excess of the trigger level proposed, would have negligible impact on the receiving waterbody.

It is proposed that Condition 6.14.2 be amended in keeping with the equivalent condition 5.3 in W0283-01, as follows:

6.14.2 *Unless otherwise agreed by the Agency in circumstances where it is satisfactorily demonstrated that discharge at a higher level will not cause environmental pollution, the trigger levels for storm water discharge to surface water at SWD1 are:*

- (i) *Suspended Solids 35 mg/l*
- (ii) *BOD 2.6 mg/l*
- (iii) *Total Ammonia (as N) 0.14 mg/l*

2.22 Condition 6.16

Condition 6.16 reads:

6.16 *The licensee shall, within six months of the date of grant of this licence, develop and establish a Data Management System for collation, archiving, assessing and graphically presenting the monitoring data generated as a result of this licence.*

2.22.1 Grounds for Objection

Given the uncertain timelines involved in the detailed design, contractor procurement and construction of the facility, it is considered that the requirement for the development of a Data Management System within six months of the date of grant of this licence is inappropriate.

It is suggested that Condition 6.16 should read:

6.16 *The licensee shall, prior to commencement of waste acceptance at the facility, develop and establish a Data Management System for collation, archiving, assessing and graphically presenting the monitoring data generated as a result of this licence.*

2.23 Condition 6.18

Condition 6.18 reads:

6.18.1 *All putrescible and other odour-forming waste stored overnight at the facility shall be stored in suitably covered and enclosed containers, and shall be removed from the facility within 48 hours of its arrival or generation on site, except, in the case of waste to be removed from the facility, at Public Holiday weekends. At Public Holiday weekends, such waste shall be removed within 72 hours of its arrival or generation on site.*

2.23.1 Grounds for Objection

Putrescible and other odour forming waste stored overnight at the facility will consist of separately collected biowaste and 'black bag' residual waste accepted the facility. Of these wastestreams, separately collected biowaste is likely to have the greater potential for odour generation.

As indicated in the waste licence application, separately collected biowaste will be stored in a separate and fully enclosed part of the building with negative air extraction prior to odour abatement treatment, thus preventing any potential negative impacts associated with potential odours from this material.

In addition, 'black bag' residual waste will be accepted and stored within the fully enclosed transfer area of the facility, therefore minimising potential odour related impacts from this material.

It is considered that the storage of putrescible and other odour forming waste in suitably covered and enclosed containers is impractical and that a fully enclosed building provides an equivalent and, in the case of the biowaste storage area operating under negative air, a superior means of odour control, than covered and/or enclosed containers.

It is submitted that Condition 6.16 should read:

6.18.1 All putrescible and other odour-forming waste stored overnight at the facility shall be stored in fully enclosed buildings, and shall be removed from the facility within 48 hours of its arrival or generation on site, except, in the case of waste to be removed from the facility, at Public Holiday weekends. At Public Holiday weekends, such waste shall be removed within 72 hours of its arrival or generation on site.

2.24 Condition 6.19.2

Condition 6.19.2 reads:

6.19.2 The floor of the waste reception and processing building shall be cleaned on a weekly basis and on a daily basis where putrescible waste is handled. The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied, or as a minimum on a weekly basis.

2.24.1 Grounds for Objection

The requirement for the washing down of the storage bays for recovered wastes at a minimum of a weekly basis is considered impractical for a number of reasons. The nature of the recovered material i.e. paper, card, plastics, metals, is dry, given that its origin is the dry recyclables wastestream and does not generate any waste that requires washing down.

In addition, the frequency of emptying of each of these bays will be based on the logistics of material movement offsite, which will be influenced by market conditions. In the quite likely event that material will be stored in these bays for in excess of a week, the condition as currently drafted would require the unnecessary movement of this material to facilitate washing, therefore increasing resource consumption e.g. fuel and water.

It is suggested that Condition 6.19.2 should read:

6.19.2 The floor of the waste reception and processing building shall be cleaned on a weekly basis and on a daily basis where putrescible waste is handled. The floor of the storage bays for recovered wastes shall be cleaned on each occasion such bays are empty.

2.25 Condition 6.19.3

Condition 6.19.3 reads:

6.19.3 All waste handling/processing plant shall be cleared of all waste and washed down on a weekly basis.

2.25.1 Grounds for Objection

The condition as currently written does not reflect operational practices in operating transfer stations and dry material recycling facilities.

The introduction of water into the dry materials processing plant may have a negative impact on the quality of recovered recyclable materials and is not necessary given the dry nature of the wastes being processed.

It is submitted that Condition 6.19.3 should read:

6.19.3 All waste handling/processing plant shall be cleared of all waste at an appropriate frequency.

2.26 Condition 7.1

Condition 7.1 reads:

- 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.*

2.26.1 Grounds for Objection

Given the uncertain timelines involved in the detailed design, contractor procurement and construction of the facility, it is considered that the requirement for carrying out an energy efficiency audit within one month of the date of grant of this licence is inappropriate.

It is suggested that Condition 7.1 should read:

- 7.1 *The licensee shall carry out an audit of the energy efficiency of the site within one year of commencement of waste acceptance at the facility. 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.*

2.27 Condition 10

The title of Condition 10 is "Closure, Restoration and Aftercare Management".

2.27.1 Grounds for Objection

It is suggested that the reference to restoration and aftercare in the Condition title is more applicable to a landfill licence where there may be significant restoration and long term aftercare requirements.

Given the nature of the facility and the subsequent content of conditions 10.1 to 10.4, and in keeping with other licences e.g. W0283-01, it is suggested that Condition 10 be entitled:

Condition 10 Decommissioning and Residuals Management.

2.28 Condition 11.6 (xiii)

Condition 11.6 (xiii) reads:

- (xiii) *the name and qualifications of all persons who carry out all sampling and monitoring as required by this licence and who carry out the interpretation of the results of such sampling and monitoring*

2.28.1 Grounds for Objection

It is suggested that this condition contains a typo and should read:

- (xiii) *the name and qualifications of all persons who carry out all sampling and monitoring as required by this licence and who carry out the interpretation of the results of such sampling and monitoring*

2.29 Condition 12.1.1

Condition 12.1.1 reads:

12.1.1 The licensee shall pay to the Agency an annual contribution of €9,750, or such sum as the Agency from time to time determines, having regard to variations in the extent of reporting, auditing, inspection, sampling and analysis or other functions carried out by the Agency, towards the cost of monitoring the activity as the Agency considers necessary for the performance of its functions under the Waste Management Act 1996 as amended. The first payment shall be a pro-rata amount for the period from the date of commencement of enforcement to the 31st day of December, and shall be paid to the Agency within one month from the date of grant of the licence. In subsequent years the licensee shall pay to the Agency such revised annual contribution as the Agency shall from time to time consider necessary to enable performance by the Agency of its relevant functions under the Waste Management Act 1996 as amended, and all such payments shall be made within one month of the date upon which demanded by the Agency.

2.29.1 Grounds for Objection

Given the time required to procure and construct the Drumman Facility, the "date of commencement of enforcement" cannot be readily identified. As such, it is submitted that the wording of Condition 12.1.1 should be amended as follows, to relate to commencement of waste acceptance at the facility (in line with the wording of this condition in other waste licences²):

12.1.1 The licensee shall pay to the Agency an annual contribution of €9,750, or such sum as the Agency from time to time determines, having regard to variations in the extent of reporting, auditing, inspection, sampling and analysis or other functions carried out by the Agency, towards the cost of monitoring the activity as the Agency considers necessary for the performance of its functions under the Waste Management Act 1996 as amended. The first payment shall be a pro-rata amount for the period from the date of commencement of enforcement to the 31st day of December, and shall be paid to the Agency within one month from the date of commencement of enforcement. In subsequent years the licensee shall pay to the Agency such revised annual contribution as the Agency shall from time to time consider necessary to enable performance by the Agency of its relevant functions under the Waste Management Act 1996 as amended, and all such payments shall be made within one month of the date upon which demanded by the Agency.

2.30 Condition 12.2.3

Condition 12.2.3 reads:

12.2.3 The licensee shall, prior to commencement of waste acceptance at the facility and to the satisfaction of the Agency, make financial provision to cover any liabilities associated with the operation (including closure, restoration and aftercare).

2.30.1 Grounds for Objection

Pursuant to the comments made in relation to Condition 10 and to ensure commonality of language throughout the licence, it is considered appropriate to remove the reference to restoration and aftercare, such that Condition 12.2.3 reads:

12.2.3 The licensee shall, prior to commencement of waste acceptance at the facility and to the satisfaction of the Agency, make financial provision to cover any liabilities associated with the operation (including closure and decommissioning).

² Kilshane Cross Recycling Park, W0223-01

2.31 Condition 12.2.5

Condition 12.2.5 reads:

12.2.4 *The licensee shall revise the cost of closure, restoration and aftercare annually and any adjustments shall be reflected in the financial provision made under Condition 12.2.4.*

2.31.1 Grounds for Objection

Reflecting the comments made in relation to Condition 12.2.3 and to ensure commonality of language throughout the licence, it is considered appropriate to remove the reference to restoration and aftercare, such that Condition 12.2.4 reads:

12.2.4 *The licensee shall revise the cost of closure and decommissioning annually and any adjustments shall be reflected in the financial provision made under Condition 12.2.4.*

2.32 Schedule B.1.2

Schedule B.1.2 presents the following:

B.1.2 Emissions from Dust Extraction Unit

Emission Point Reference No: A2
Location: To be agreed by the Agency

Parameter	Emission Limit Value
Dust	30 mg/m ³

2.32.1 Grounds for Objection

As per the Agency publication "Final Draft BAT Guidance Note on Best Available Techniques for the Waste Sector: Waste Transfer and Materials Recovery", the use of dust extraction is considered BAT in itself. The BAT Guidance Note for the Waste Sector, Waste Transfer and Materials Recovery does not contain any specific emission limit value in terms of dust emission from dust extraction systems, nor does the supporting 'BREF for Waste Treatment Industries'.

The origin of the emission limit value proposed is unclear. The Applicant is not aware of any such similar emission limit value in any other waste transfer or materials recycling facility licence in the country. It is contended that such an emission limit value is unnecessary and unwarranted and that the installation of a dust extraction system in itself is fully in accordance with BAT.

As per the requirement for dust deposition monitoring, as per Schedule B.1.3, any impact resulting from dust generation will be monitored on an ongoing basis, to ensure that, in keeping with Section 6.3.3 of the BAT Guidance Note, no "significant impairment of, and/or significant interference with amenities or the environment beyond the installation boundary" will occur.

It is suggested that Schedule B.1.2 be removed.

2.33 Schedule B.2

Schedule B.2 presents the following:

B.2 Emissions to Water

Emission Point Reference No:	SW1 - outlet from waste water treatment plant (as per Drawing Number LW09-660-04-200-025 Rev A)
Name of Receiving Waters:	Mongagh River (WFD Code: IE_EA_07_1025)
Location:	248934E 238848N
Volume to be emitted:	Maximum in any one day: 9 m ³
	Maximum in any one hour: 0.5 m ³

Parameter	Emission Limit Value
Temperature	25°C (max.)
pH	6 - 9
	mg/l
BOD	20
COD	125
Suspended Solids	25
Ammonia (as N)	2
Orthophosphate (as P)	2

2.33.1 Grounds for Objection

Schedule B.2 references SW1, as identified in Drawing Number LW09-660-04-200-025 Rev A.

Drawing Number LW09-660-04-200-025 Rev A was submitted as part of the Article 14 (2)(b)(ii) response, dated 15.08.13, but refers to a Site Services Plan.

Drawing Number LW09-660-04-300-005 Rev B was also submitted as part of the Article 14 (2)(b)(ii) response, and is titled 'Proposed Emission and Monitoring Locations'.

This drawing identified surfacewater monitoring points as SW1 and SW2 and surfacewater emissions points as SWD.

It is considered necessary to revise Drawing Number LW09-660-04-300-005 Rev B to provide clarity on surface water monitoring and emission locations. Drawing Number LW09-660-04-300-005 Rev C is included in the Appendix 2 to this document to provide clarity.

In summary, Drawing Number LW09-660-04-300-005 Rev C indicates the following:

- SW1 Downstream surfacewater monitoring location
- SW2 Upstream surfacewater monitoring location
- SWD1 Emission location - waste water treatment plant
- SWD2 Emission location - stormwater discharge

To this end, Schedule B2 should be amended to identify the Emission Point Reference Number as "SWD1, as per Drawing Number LW09-660-04-300-005 Rev C."

In addition, comments regarding Condition 6.14.2 in Section 2.21 should be reflected in Schedule B.2.

2.34 Schedule C1.1

Schedule C1.1 presents the following:

SCHEDULE C: Control & Monitoring*C.1.1 Control of Emissions to Air*

Emission Point Reference No: Bio-filtration Unit: A1
Description of Treatment: Bio-filtration

Control Parameter	Monitoring	Key Equipment ^{Note 1}
Air Management and Treatment		
Air extraction	Continuous with alarm/call-out	Pumps/ engines Pressure gauges
Bio-filters		
Ammonia	Monthly (at inlet and outlet)	Colorimetric indicator tubes ^{Note 1}
Hydrogen sulphide	Monthly (at inlet and outlet)	Colorimetric indicator tubes ^{Note 2}
Mercaptans	Monthly (at inlet and outlet)	Colorimetric indicator tubes ^{Note 2}
Ammoniac	Monthly (at inlet and outlet)	Colorimetric indicator tubes ^{Note 1}
Bed Media ^{Note 3}		
Odour assessment	Daily	Subjective impression
Condition and depth of bed media	Daily	Visual inspection
Moisture content	Monthly	Agreed method
pH	Bi-annually	Agreed method
Ammonia	Bi-annually	Agreed method
Total viable counts	Bi-annually	Agreed method
General		
Fan	Daily visual check	System is operational
Negative pressure across bio-filter	Monthly	Air current tubes

2.34.1 Grounds for Objection

In the interests of clarity, it is submitted that "Negative pressure across biofilter" should read "Differential pressure across biofilter".

It is suggested that this text in Schedule C1.1 is reworded to:

"Differential pressure across biofilter"

2.35 Schedule C1.2

Schedule C1.2 presents the following:

C.1.2 Monitoring of Emissions to Air

Emission Point Reference No:

Bio-filtration Unit: A1

Parameter	Monitoring Frequency	Analysis Method/Technique
Odour	Quarterly	Sec ^{Note 1}
Ammonia	Monthly (at outlet of Biofilter)	Colorimetric indicator tubes ^{Note 2}
Hydrogen sulphide	Monthly (at outlet of Biofilter)	Colorimetric indicator tubes ^{Note 2}
Mercaptans	Monthly (at outlet of Biofilter)	Colorimetric indicator tubes ^{Note 2}
Amines	Monthly (at outlet of Biofilter)	Colorimetric indicator tubes ^{Note 2}

Note 1: Odour measurements shall be by olfactometric measurement and analysis shall be for mercaptans, hydrogen sulphide, ammonia, and amines.

Note 2: Or an alternative method agreed by the Agency.

2.35.1 Grounds for Objection

The biofiltration unit at the Drumman facility will be treating ambient air from within the biowaste reception building. While this air is potentially odorous, the odour unit loading to the biofiltration unit will be significantly lower than if the biofiltration unit was treating, for example, process air from a composting process.

It is therefore considered excessive to require quarterly olfactometric measurement and analysis, especially when compared to, for example, W0283-01, where bi-annual monitoring is required at the biofilter outlets, where that biofiltration unit is treating composting process air.

Monthly measurement of ammonia, hydrogen sulphide, mercaptans and amines is also considered excessive when considering the low odorous load to the biofiltration unit.

It is also considered that the monitoring frequencies should be reviewed after 12 months of operation. On the basis that the facility is not leading to odour nuisance and that the odour emission concentrations from the bio-filtration unit are within specification, it is requested that the frequency of monitoring be reduced to once per annum after the first year of operation as outlined below:

It is therefore suggested that the monitoring frequency in C1.2 be adjusted as follows:

Parameter	Monitoring Frequency ^{Note 3}
Odour	Biannual
Ammonia	Quarterly
Hydrogen Sulphide	Quarterly
Mercaptans	Quarterly
Amines	Quarterly

With the insertion of the following Note 3:

Monitoring frequency to be reviewed after 12 months of operation.

2.36 Schedule C2.1

Schedule C2.1 presents the following:

C.2.1 Monitoring of Emissions to Water

Emission Point Reference No: SW1
Description of Treatment: Secondary treatment of sanitary effluent and foul water

Control Parameter	Monitoring Frequency ^{Note 1}	Key Equipment/Technique
Flow	Continuous Daily ^{Note 2}	On-line flow meter with recorder
Temperature	Continuous	On-line temperature probe with recorder
pH	Continuous	pH electrode/meter with recorder
Total Ammonia (as N)	Monthly	Standard Method
Chemical Oxygen Demand	Monthly	Standard Method
Suspended Solids	Monthly	Standard Method
Biochemical Oxygen Demand	Monthly	Standard Method
Orthophosphate (as P)	Monthly	Standard Method
Nitrate	Monthly	Standard Method
Phenols	Monthly	Standard Method
Oils, fats and greases	Monthly	Standard Method
Priority Substances ^{Note 3}	Annually	Standard Method
Toxicity ^{Note 4}	As may be required	To be agreed by the Agency

Note 1: The licensee shall install a composite sampler. All samples shall be collected on a 24 hour flow proportional composite sampling basis.

Note 2: Total effluent discharged over the 24 hour period in which the composite sample is collected shall be recorded.

Note 3: The relevant priority substances or pollutants for monitoring shall be identified by the licensee by undertaking a risk based assessment. The licensee shall have regard to "Guidance on the Screening for Priority Substances for Waste Water Discharge Licences" issued by the Agency.

Note 4: The number of toxic units (TU) = 100 x hour EC₅₀ in percentage vol/vol so that higher Tu values reflect greater levels of toxicity. For test regimes where species death is not easily detected, immobilisation is considered equivalent to death.

2.36.1 Grounds for Objection

As per the explanation given in Section 2.32 regarding the identification of surfacewater monitoring and emission points, Schedule C2.1 should be revised to identify the emission point reference number as "SWD1 as per Drawing Number LW09-660-04-300-005 Rev C."

Furthermore, in keeping with Note 2 of Schedule C2.2, it is suggested that a Note 5 be added to Schedule C2.1 to read:

Note 5: *The monitoring frequency for each parameter can be reduced with the prior agreement of the Agency.*

2.37 Schedule C2.2

Schedule C2.2 presents the following:

C.2.2 Monitoring of Storm Water discharge

Discharge Point Reference No: SW2 - outlet from a pipe from surface water attenuation pond (as per Drawing Number LW09-660-04-200-025 Rev A)

Parameter ^{Note 1}	Monitoring Frequency ^{Note 2}	Analysis Method/Technique
Visual Inspection	Daily	Sample and examine for colour and odour.
pH	Continuous	Standard method
COD	Quarterly	Standard method
BOD	Quarterly	Standard method
Total Ammonia	Quarterly	Standard method
Suspended Solids	Quarterly	Standard method
Sulphate	Quarterly	Standard method
Mineral Oils	Quarterly	Standard method
Dissolved metals	Annually	Standard method
Hazardous substances	Annually	Standard method

Note 1: All the analysis shall be carried out by a competent laboratory using standard and internationally accepted procedures.

Note 2: Apart from the visual inspection the monitoring frequency for each parameter can be reduced with the prior agreement of the Agency.

2.37.1 Grounds for Objection

As per the explanation given in Section 2.32 regarding the identification of surfacewater monitoring and emission points, Schedule C2.2 should be revised to identify the emission point reference number as "SWD2 as per Drawing Number LW09-660-04-300-005 Rev C."

2.38 Schedule C6.2

Schedule C6.2 presents the following.

C.6.2 Receiving Water Monitoring

Location: Upstream and downstream of SW1 (as per Drawing Number LW09-660-04-300-005 Rev B)

Control Parameter	Monitoring Frequency	Analysis Method/ Techniques
pH	Annually	pH electrode/meter with recorder
TOC	Annually	On-line TOC meter with recorder
Total Ammonia (as N)	Annually	Standard Method
Chemical Oxygen Demand	Annually	Standard Method
Suspended Solids	Annually	Standard Method
Biochemical Oxygen Demand	Annually	Standard Method
Orthophosphate (as P)	Annually	Standard Method
Biological Quality (Q) Rating/Q Link	Annually	To be agreed by the Agency
Priority Substances ^{Note 1}	As required by the Agency	Standard Method

Note 1: The relevant priority substances or pollutants for monitoring shall be identified by the licensee by undertaking a risk based assessment. The licensee shall have regard to "Guidance on the Screening for Priority Substances for Waste Water Discharge Licences" issued by the Agency.

2.38.1 Grounds for Objection

As per the explanation given in Section 2.32 regarding the identification of surfacewater monitoring and emission points, Schedule C6.2 should be revised to identify the monitoring location as:

- SW1 Downstream surfacewater monitoring location (as per Drawing Number LW09-660-04-300-005 Rev C)
- SW2 Upstream surfacewater monitoring location (as per Drawing Number LW09-660-04-300-005 Rev C)

2.39 Schedule C6.3

Schedule C6.3 presents the following.

C.6.3 Groundwater Monitoring

Location: GW1 (to be agreed by the Agency in advance of the commencement of the waste activity)

Parameter	Monitoring Frequency	Analysis Method/Techniques
PH	Biannually	pH electrode/meter
COD	Biannually	Standard Method
Nitrate	Biannually	Standard Method
Total Ammonia	Biannually	Standard Method
Total Nitrogen	Biannually	Standard Method
Conductivity	Biannually	Standard Method
Chloride	Biannually	Standard Method
Fluoride	Biannually	Standard Method
Hazardous Compounds ^{Note1}	Biannually	Standard Method

Note 1: 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

2.39.1 Grounds for Objection

All waste operations associated with the facility will occur over impermeable, concreted surfaces. Any accidental spillages or firewater will be collected within the surfacewater collection system and contained within the stormwater attenuation pond. All subsurface pipework will be installed under the construction quality assurance validation requirements of Condition 3.6.3. Thus, the risk of any negative impact on groundwater resulting from facility operations is considered low and therefore biannual monitoring of groundwater is considered excessive.

It is therefore suggested that the monitoring frequency in C6.3 be adjusted as follows:

Parameter	Monitoring Frequency
pH	Annual
COD	Annual
Nitrate	Annual
Total Ammonia	Annual
Total Nitrogen	Annual
Conductivity	Annual
Chloride	Annual
Fluoride	Annual
Hazardous Compounds	Annual

2.40 Schedule E

Schedule E presents the following:

Annual Environmental Report Content ^{Note 1}
Emissions from the facility.
Waste management record.
Waste Recovery Report.
Waste activities carried out at the facility.
Quantity and composition of waste recovered, received and disposed of during the reporting period and each previous year (relevant EWC codes to be used).
Volume of trade effluent/leachate and/or contaminated stormwater produced and volume discharged or transported off-site.
Resource consumption summary.
Complaints summary.
Schedule of Environmental Objectives and Targets.
Environmental management programme – report for previous year.
Environmental management programme – proposal for current year.
Pollutant Release and Transfer Register – report for previous year.
Pollutant Release and transfer Register – proposal for current year.
Noise monitoring report summary.
Review of nuisance controls.
Ambient monitoring summary.
Full title and a written summary of any procedures developed by the licensee in the year which relates to the facility operation.
Tank and pipeline testing and inspection report.
Reported incidents summary.
Energy efficiency audit report summary.
Report on the assessment of the efficiency of use of raw materials in processes and the reduction in waste generated.
Report on progress made and proposals being developed to minimise water demand and the volume of trade effluent discharges.
Development/Infrastructural works summary (completed in previous year or prepared for current year).
Reports on financial provision made under this licence, management and staffing structure of the facility, and a programme for public information.
Review of Closure, restoration & aftercare management Plan.
Statement of measures in relation to prevention of environmental damage and remedial actions (Environmental Liabilities).
Environmental Liabilities Risk Assessment Review (every three years or more frequently as dictated by relevant on-site change including financial provisions).
Any other items specified by the Agency.

Note 1: Content may be revised subject to the agreement of the Agency.

2.40.1 Grounds for Objection

Schedule E requires the provision of “Quantity and composition of waste received, recovered and disposed of during the reporting period and each previous year (relevant EWC codes to be used)” in the Annual Environmental Report (AER). In the interests of conciseness and given that AERs for previous years will be readily available, it is submitted that the AER for any particular year (with the exception of year 1) should only require waste details for the reporting year and the previous year as opposed to “each previous year”.

In addition, Schedule E requires annual review of the “Closure, Restoration and Aftercare Management Plan”.

It is suggested that the relevant text in Schedule E is reworded to:

Quantity and composition of waste received, recovered and disposed of during the reporting period and the previous year (relevant EWC codes to be used)

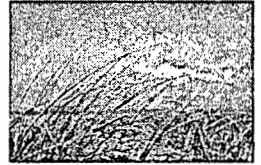
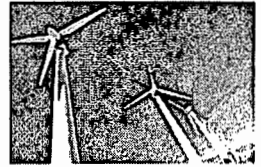
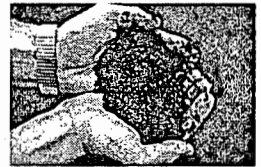
&

Review of the Decommissioning Management Plan

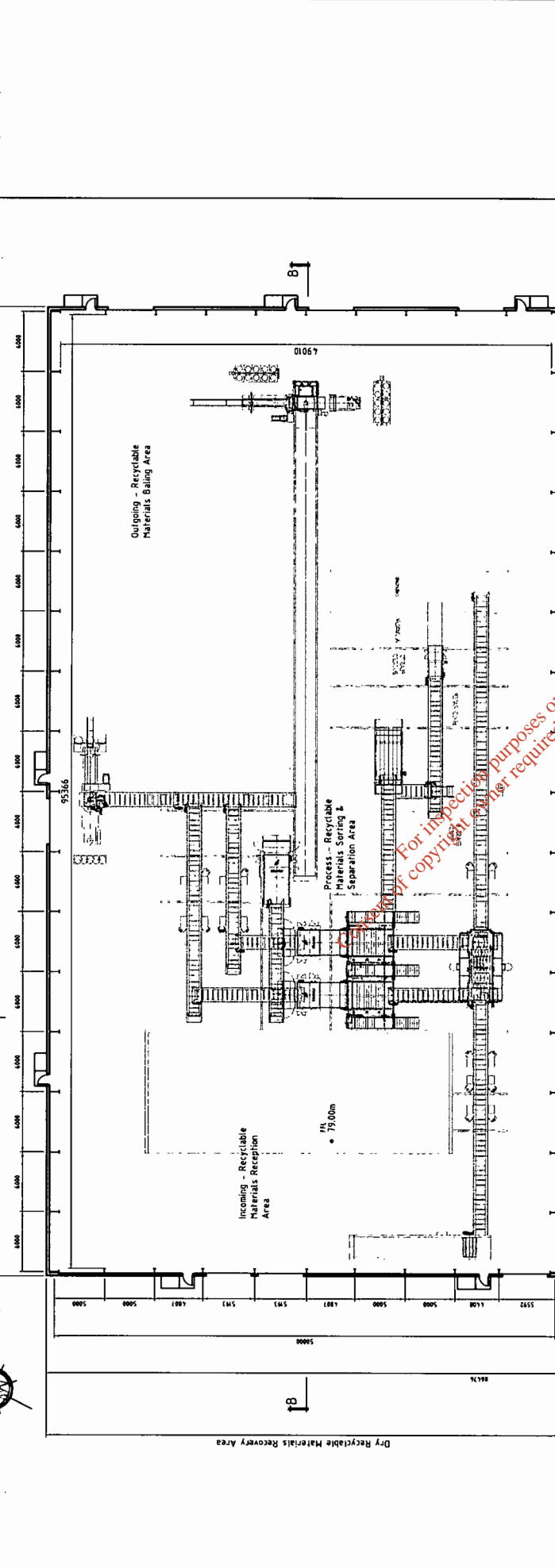
Appendix 1

Drawing Number LW09-660-04-100-004

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Code	Issue	Description	Name of Client
A	1	Issue for Planning Permission	Board no Name PLC
B	1		
C	1		
D	1		
E	1		
F	1		
G	1		
H	1		
I	1		
J	1		
K	1		
L	1		
M	1		
N	1		
O	1		
P	1		
Q	1		
R	1		
S	1		
T	1		
U	1		
V	1		
W	1		
X	1		
Y	1		
Z	1		

Scale Used: 1:200
 Drawing No: LW09-660-04-100-004
 Rev: A

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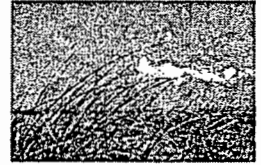
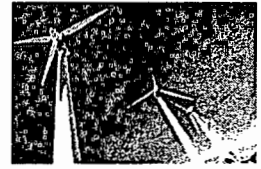
FLOOR PLAN
 Scale 1:200

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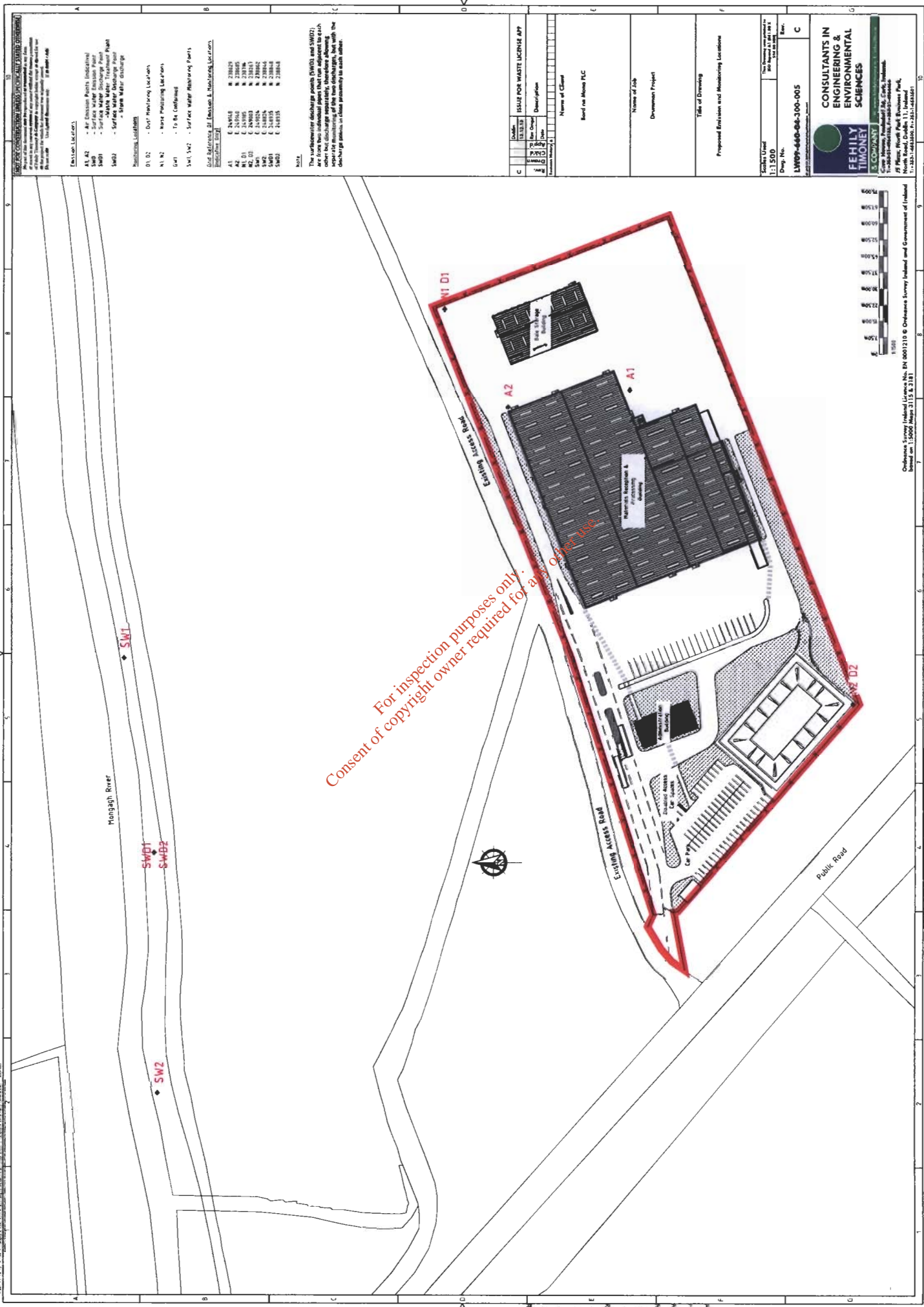
Appendix 2

Drawing Number LW09-660-04-300-005 RevC

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WASTE CONCENTRATION AND TREATMENT PLANT

Site plan showing the location of the Waste Concentration and Treatment Plant (WCTP) and the proposed location of the new WCTP. The site is located on the east bank of the Hongnagh River, adjacent to the existing access road. The plan shows the layout of the buildings, roads, and proposed discharge points (SW1, SW2, SWB1, SWB2). The site is bounded by the river to the west and the existing access road to the east. The proposed new WCTP is located to the east of the existing WCTP, adjacent to the existing access road. The plan also shows the location of the proposed discharge points (SW1, SW2, SWB1, SWB2) and the proposed location of the new WCTP. The site is bounded by the river to the west and the existing access road to the east. The proposed new WCTP is located to the east of the existing WCTP, adjacent to the existing access road. The plan also shows the location of the proposed discharge points (SW1, SW2, SWB1, SWB2) and the proposed location of the new WCTP.

- EMISION LOCATIONS**
- A1 A2 - Air Emission Points (Indicative)
 - SW1 - Surface Water Emission Point
 - SWB1 - Surface Water Discharge Point
 - SW2 - Surface Water Discharge Point
 - SWB2 - Surface Water Discharge Point
- Monitoring Locations**
- D1 D2 - DWT Monitoring Location
 - W1 W2 - Waste Processing Location
 - D41 - To Be Confirmed
 - SW1 SW2 - Surface Water Monitoring Points

Grid Reference of Emission & Monitoring Locations

Location	Grid Reference
A1	E 238229
A2	E 238229
SW1	E 238229
SWB1	E 238229
SW2	E 238229
SWB2	E 238229

NOTE

The surface water discharge points (SW1 and SW2) are from two individual pipes that run adjacent to each other but discharge separately, therefore allowing the discharge points to be located in close proximity to each other.

Code	Issue For Waste License App
1	Application
2	Consent
3	Extension
4	Transfer
5	Renewal
6	Other

Name of Client
 Based on Above PLC

Name of Job
 Development Project

Title of Drawing
 Proposed Emissions and Monitoring Locations

Scale Used
 1:1,500

Drawn No.
 LW09-660-06-100-005

Scale
 C

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Waste Concentration and Treatment Plant
 Proposed Emissions and Monitoring Locations

Scale Used
 1:1,500

Drawn No.
 LW09-660-06-100-005

Scale
 C

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