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Your Ref W0281-01

26th March 2014

Dear Ms Smith

Limerick Gasworks Remediation- Industrial Emissions Licence Application

Further to the letter issued by Michael Owens dated the 19th of February 2014 entitled 'Notice for the purposes of Section 76A(3) of the Waste Management Act, as amended'. We have responded to the items prescribed in Regulation 9 of the EPA (Industrial Emissions) (Licensing) Regulations 2013 as detailed below;

Regulation 9 - Application for a Licence:

Paragraph (1)- A Waste Licence Application was submitted to the EPA, reference W0281-01, on 3rd May 2012.

Paragraph (2)(a) and (2)(b)- The Waste Licence application, reference W0281-01, Sections B.1, B.2, B.3 and B.4 complied with all requirements of paragraphs (2)(a) and (2)(b) where applicable.

Paragraph (2)(c)- Relevant classes in the First Schedule of the Act of 1992 are included in the attached Site Notice and Newspaper Notice. These details were also included in the 'Registration Form – Declaration by waste licence applicants as to whether proposed licensable activities fall under the revised First Schedule of the EPA Acts 1992 to 2013' submitted by Bord Gais Eireann on 1st October 2013.

Paragraphs (2)(d) and (2)(e)- Planning permission has been granted by Limerick City Council, ref P12/87, a copy of which was attached to our letter to the EPA dated 5th September 2013. An Environmental Impact Statement (EIS) was included with the Waste Licence Application in May 2012, an updated version of the EIS along with a Human Environment Assessment were issued to the EPA on the 4th November 2013.

Paragraph (2)(f)- This information is included as Attachments G.1 and G.2 of the Waste Licence Application, reference W0281-01.

Paragraph (2)(g)- This information is included in our Waste Licence Application reference W0281-01, and the attached Design Specifications (references 1021927/R/22 and 1021927/R/26). Particular reference should be made to Attachments D.2 and H.3 of the Waste Licence Application.

Paragraph (2)(h)- We have set out in Section 8 of our letter dated the 5th September 2013 to the EPA detailing how the works will be compliant with BAT/BREF.

Paragraph (2)(i)- This information is included in our Waste Licence Application reference W0281-01, and the attached Design Specifications (references 1021927/R/22 and 1021927/R/26). Particular reference should be made to Attachments A.1, B.4, B.7, I.1, I.3, I.4 and I.6 of the Waste Licence Application.

Paragraph (2)(j)- This information is included in our Waste Licence Application reference W0281-01, and the attached Design Specifications (references 1021927/R/22 and 1021927/R/26). Particular reference should be made to Attachments F.1 to F.7 of the Waste Licence Application.

Paragraph (2)(k)- This information is included in our Waste Licence Application reference W0281-01, and the attached Design Specifications (references 1021927/R/22 and 1021927/R/26). Particular reference should be made to Attachments I.1 to I.7 of the Waste Licence Application.

Paragraph (2)(l)- A Quantitative Risk Assessment, Options Appraisal and Remedial Strategy Report (ref-1021927/R/03C) was prepared reviewing all remediation options appropriate to this scheme, a copy of which was included with the Waste Licence Application. Particular reference should be made to Sections 6 and 7.

Paragraph (2)(m)- The site condition is described in the Quantitative Risk Assessment, Options Appraisal and Remedial Strategy Report (ref-1021927/R/03C), a copy of which was included with the Waste Licence Application. Particular reference should be made to Sections 3, 4 and 5.

Paragraph (2)(n)- A Baseline Report in accordance with Section 86B of the Act of 1992 is attached, reference 1021927/R/30.

Paragraph (2)(o)- Please refer to Section 8 of our letter dated the 5th September 2013 to the EPA detailing how the works will be compliant with BAT/BREF.

Paragraph (2)(p)- The works are temporary in nature and designed to remove the main sources of contamination identified at the site. No pollution is anticipated over long distances or in the territory of other states due to the nature of the contamination and ground conditions encountered as detailed within our Quantitative Risk Assessment, Options Appraisal and Remedial Strategy Report (ref-1021927/R/03C), a copy of which was included with the Waste Licence Application. Particular reference should be made to Section 5.

Paragraph (2)(q)- All remedial works are required to be undertaken in accordance with the Design Specifications (references 1021927/R/22 and 1021927/R/26), which require the Contractor for the works to provide an Environmental Management Plan (EMP) and Emergency Response Procedure (ERP) including mitigation measures for potential abnormal working conditions. Reference should also be made to sections A751, A773, A774 and A775. Also refer to Attachment J.1 of the Waste Licence Application.

Paragraph (2)(r)- The works are temporary in nature and designed to remove the main sources of contamination identified at the site. Details are included within our Quantitative Risk Assessment, Options Appraisal and Remedial Strategy Report (ref-1021927/R/03C); in particular Section 5 and Design Specifications (references 1021927/R/22 and 1021927/R/26); in particular Sections A751, A773, A774 and A775, copies of which were included with the Waste Licence Application. Also please refer to section 10 of our letter dated the 5th September 2013 to the EPA

Paragraph (2)(s)- Please refer to Section 2 of our letter dated the 5th September 2013 to the EPA.

Paragraph (2)(t)- Please refer to Attachments B.7 H.1 and H.4 of the Waste Licence Application dated May 2012, EPA reference W0281-01. Note that no wastes are to be accepted at the facility.

Paragraph (2)(u)- Please refer to Attachments B.8 of the Waste Licence Application dated May 2012, EPA reference W0281-01. The European Communities (Control of Major Activities Hazards involving Dangerous Substances) Regulations 2006, do not apply to this activity.

Paragraph (2)(v)- Please refer to Sections 4 and 6 of our letter dated the 5th September 2013 to the EPA and Section J.1 of the Waste Licence Application.

Paragraph (2)(w)- An updated version of the Non-Technical Summary is attached.

Paragraph (2)(x)- We understand all information in respect to Article 11 of the Industrial Emissions Directive has now been provided.

Paragraph (3)- Not applicable

Paragraphs (4)(a) and (b)- A copy of the relevant page of the newspaper in which the notice has been published and a copy of the site notice are attached.

Paragraph (4)(c)- A copy of an e-mail issued to the Planning Authority, Limerick City Council attaching a copy of the Site Notice is attached.

Paragraph (4)(d)- Reference should be made to Drawing no.'s 1021927/PHASE 1 – TENDER/ OD/ 001-002 and 007 and Drawing no.'s 1021927/PHASE 2 – TENDER/ OD/ 001-002 and 007 included in the Design Specifications (references 1021927/R/22 and 1021927/R/26). Also please refer to Section 3, 4, 5 and 6 of our letter dated the 5th September 2013 to the EPA.

Paragraph (4)(e)- The appropriate fee has been paid (reference Section B.7.3 of the Waste Licence Application dated May 2012, EPA reference W0281-01).

Paragraph (5)- One signed original, one hard copy and 2 electronic copies of this letter plus the accompanying documents have been submitted in accordance with this subparagraph.

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

Yours sincerely



Tony Brown
Technical Director
For and on behalf of Mouchel

Encs (one original, one hard copy and 2 electronic copies)

Baseline Report- 1021927/R/30- March 2014
Non-Technical Summary – March 2014
Site Notice – 22nd March 2014
Newspaper Notice – 22nd March 2014
e-mail correspondence with Limerick City Council- Planning Authority