
From: John Connolly [mailto:John.Connolly@bnm.ie]
Sent: 02 April 2014 16:06
To: Brian Meaney
Cc: Michael Owens
Subject: W0283-01

Brian,

As you know, we are very concerned that the inherent uncertainty arising from Condition 8.17 (regarding approval to store baled and wrapped SRF) would render this project commercially unviable.

I had planned to talk with you after yesterday's Type 8 meeting in DECLG, and took the opportunity to have a word with Michael Owens (copied here) in your absence.

I received the voicemail which you left for me last week. However, following a review of the relevant documentation, it is clear that the waste licence application both provided for the storage of SRF as a 'Fourth Schedule, Class 13' activity and for the arrangements for the storage of SRF.

We are therefore of the view that Condition 8.17 is unjustified and should be removed. It is also inconsistent with other provisions of the licence.

Please find attached a document outlining our position which also contains references (in the WLA documentation) to the storage of baled and wrapped SRF at the Drehid MBT Facility, and Figure 2.2 of EIS (Volume II) which shows the outdoor SRF Storage Area.

We are very keen to advance this issue and I would therefore be grateful for your earliest response.

Regards,

John

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Drehid Mechanical Biological Treatment (MBT) Facility **Waste Licence W0283-01**

1 Background

Waste Licence W0283 -01 (Final Decision) granted by the Agency on February 27th 2014 contains a Condition 8.17. The Proposed Decision, issued in November 2013, did not include the following Condition 8.17.

Condition 8.17

Baled and wrapped RDF/SRF shall only be stored at the facility with the approval of the Agency.

2 Applicant's Position

Following detailed pre-application consultation with the Agency on the storage of baled and wrapped SRF, the Waste Licence Application clearly provided for this storage activity. It is Bord na Móna's position that Condition 8.17 is unjustified and should be removed.

The production and storage of SRF is a fundamental component of the overall waste treatment activity permitted at the Drehid MBT Facility. As set out in the Waste Licence Application Attachments Report (Attachment A - Section 7(h), Page 41 and Page 42), the facility provides for the production of 78,159 tonnes of SRF.

The logistics associated with the shipping of SRF overseas will be reliant on the storage of baled and wrapped SRF. The inherent uncertainty arising from Condition 8.17 regarding approval to store baled and wrapped SRF would render the project commercially unviable.

Storage of waste for recovery was a waste activity (Fourth Schedule of the Waste Management Act 1996 as amended, Class 13) applied for and subsequently granted by the Agency.

Section B.7 (Type of Waste Activity, Tonnages & Fees) of the Waste Licence Application Form contains the following instruction to Applicants:

"Attachment B.7 should identify the principle activity and include a brief technical description of each of the other activities specified. There can only be one principal activity."

In response to this instruction, the Waste Licence Application Attachments Report contained an Attachment B.7 (Page 52 and Page 53). This Attachment B.7 includes the following 'brief technical description' in respect of the foregoing 'storage' activity.

"Fourth Schedule, Class 13 – Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).

This waste licence application provides for the storage of SRF and Recyclables (including metals and plastics (e.g. PET, HDPE)) prior to recovery off-site."

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The tonnage of 115,500 included for Class R13 in Table H.1(A) of the Waste Licence Application Form was designed to provide for the storage of 78,159 tonnes of SRF and 37,397 tonnes of recyclables (refer to Waste Licence Application Attachments Report (Attachment A - Section (h) Page 41 and Page 42). This figure of 115,500 was rounded down from 115,556.

Following a review of the Waste Licence Application documentation, the following references have been extracted in order to illustrate the emphasis placed on the arrangements for the storage of baled and wrapped SRF at the Dredged Material Barge Treatment Facility (and the associated environmental impact mitigation measures) in the application documentation.

These references clearly further demonstrate that the storage of baled and wrapped SRF was a waste activity explicitly applied for in the Waste Licence Application.

It is noted that 'Fourth Schedule, Class 13' is a waste activity permitted by Waste Licence W0283-01. Furthermore, the licence also provides for the construction of the SRF Storage Area in *Schedule D: Specified Engineering Works*.

Condition 8.17 is therefore clearly inconsistent with other provisions in the licence.

3 References

EIS (Volume II)

Section 2.2.1.10 (SRF Storage Area) – Page 80

It is proposed that baled and plastic wrapped SRF will be stored in an outdoor storage area as shown on Figure 2.2. This storage area will comprise of a bunded concrete area and the SRF will be stored in wrapped bales approximately 1m³ in size and four bales high.

Section 2.2.4.2 (Litter Control) - Page 99

There will be no external storage of waste with the exception of the baled and wrapped SRF material.

Section 2.2.4.3 (Vermin Control) – Page 99

SRF will be baled and wrapped in plastic before being stored outdoors. It should be noted that SRF will typically not contain food waste and therefore will not be attractive to vermin.

Section 2.3.1.3 (Mechanical Processing of Waste) – Page 129

The baling and wrapping station will facilitate the storage of SRF bales outdoors for longer term storage and/or transport overseas.

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EIS (Volume IV – Appendix 2.2 - Engineering Services Report)

Section 2.1(Proposed Site Infrastructure) – Page 5

SRF Storage Area

It is proposed that baled and plastic wrapped SRF will be stored in an outdoor storage area as shown on Drawing No. 6301-2602. This storage area will comprise of a bunded concrete area and the SRF will be stored in wrapped bales approximately 1m³ in size and four bales high.

Section 2.4 (Outdoor Storage Areas) – Page 9

SRF STORAGE AREA

An outdoor SRF storage area shall be constructed in the location indicated on Drawing No. 6301-2602. The SRF shall be stored in plastic wrapped bales approximately 1m³ in size and these bales shall be stored 4 bales high.

The baled SRF storage area shall be independently bunded and all surface water collected within the area contained therein. As appropriate, the collected runoff shall be assessed for any signs of potential contamination by an online analysis system and shall be directed to the surface water collection system if there are no indications of contamination. If there is any indication of potential contamination this runoff shall be directed to the waste water collection system.

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WASTE LICENCE APPLICATION FORM**SECTION H MATERIALS HANDLING – Page 34**

TABLE H.1(A). QUANTITIES OF WASTE IN RELATION TO EACH CLASS OF ACTIVITY APPLIED FOR

Waste Management Acts 1996 to 2010 3rd Schedule (Disposal) Operations			Waste Management Acts 1996 to 2010 4th Schedule (Recovery) Operations		
Class of Activity Applied For		Quantity (tpa)	Class of Activity Applied For		Quantity (tpa)
Class D 1			Class R 1		
Class D 2			Class R 2		
Class D 3			Class R 3	P	122,000
Class D 4			Class R 4		6,500
Class D 5			Class R 5	X	20,000
Class D 6			Class R 6		
Class D 7			Class R 7		
Class D 8	X	111,000	Class R 8		
Class D 9			Class R 9		
Class D 10			Class R 10		
Class D 11			Class R 11		
Class D 12			Class R 12	X	115,500
Class D 13	X	20,000	Class R 13	X	115,500
Class D 14	X	20,000			
Class D 15	X	20,000			

WASTE LICENCE APPLICATION ATTACHMENTS REPORT

Attachment A - Section (f) Page 38

Fourth Schedule, Class 13 – Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).

This waste licence application provides for the storage of SRF and Recyclables (including metals and plastics (e.g. PET, HDPE)) prior to recovery off-site.

Attachment A - Section (h) Page 41 and Page 42

Estimated Annual Outputs for Configuration A (MBT with Composting)

Output Type	Estimated Tonnage (TPA)	Envisaged Destination
Recyclables Recovered	37,397	Overseas
Solid Recovered Fuel (SRF)	78.159	Approved cement kilns located in the Republic of Ireland and overseas
Biostabilised Waste	50,084	Drehid Waste Management Facility (or other destinations - beyond life of Drehid WMF)
Rejects	19,533	Drehid Waste Management Facility (or other destinations - beyond life of Drehid WMF)
Process Losses	64,827	-

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Estimated Annual Outputs for Configuration B (MIBT with Dry Anaerobic Digestion and Composting)

Output Type	Estimated Tonnage (TPA)	Envisaged Destination
Recyclables Recovered	37,397	Overseas
Solid Recovered Fuel (SRF)	78,159	Approved cement kilns located in the Republic of Ireland and overseas
Biostabilised Waste	50,084	Drehid Waste Management Facility (or other destinations - beyond life of Drehid WME)
Rejects	19,533	Drehid Waste Management Facility (or other destinations - beyond life of Drehid WME)
Process Losses	57,983	-
Biogas	68,400	-

Attachment B.7 - Page 53

Fourth Schedule, Class 13 Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).

This waste licence application provides for the storage of SRF and Recyclables (including metals and plastics (e.g. PET, HDPE)) prior to recovery off-site.

Attachment E.6 - Page 81 and Page 82

Litter Control

There will be no external storage of waste with the exception of the baled and wrapped SRF material.

Vermin Control

SRF will be baled and wrapped in plastic before being stored outdoors. It should be noted that SRF will typically not contain food waste and therefore will not be attractive to vermin.

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Attachment J - Page 102 and Page 103

Storage of Raw Materials and Waste

SRF Storage

As noted in Section 2.2.1.10 of the EIS, it is proposed that baled and plastic wrapped SRF will be stored in an outdoor storage area as shown on Drawing 6301-2702 in Appendix 5 of the Waste Licence Application. This storage area will comprise of a bunded concrete area and the SRF will be stored in wrapped bales approximately 1m³ in size and four bales high.

Details of Spill or Emergency Containment Measures & Structures

An outdoor SRF storage area shall be constructed in the location indicated on Drawing No. 6301-2751 in Appendix 5 of the Waste Licence Application. The SRF shall be stored in plastic wrapped bales approximately 1m³ in size and these bales shall be stored 4 bales high.

The baled SRF storage area shall be independently bunded and all surface water collected within the area contained therein. As appropriate, the collected runoff shall be assessed for any signs of potential contamination by an online analysis system and shall be directed to the surface water collection system if there are no indications of contamination. If there is any indication of potential contamination this runoff shall be directed to the waste water collection system.

**RESPONSE TO ARTICLE 14(2)(B)(II) WASTE MANAGEMENT
(LICENSING) REGULATIONS REQUEST**

APPENDIX D

CRAMP, ELRA & FINANCIAL PROVISION REPORT

Table 3.1.1 Closure Plan Programme

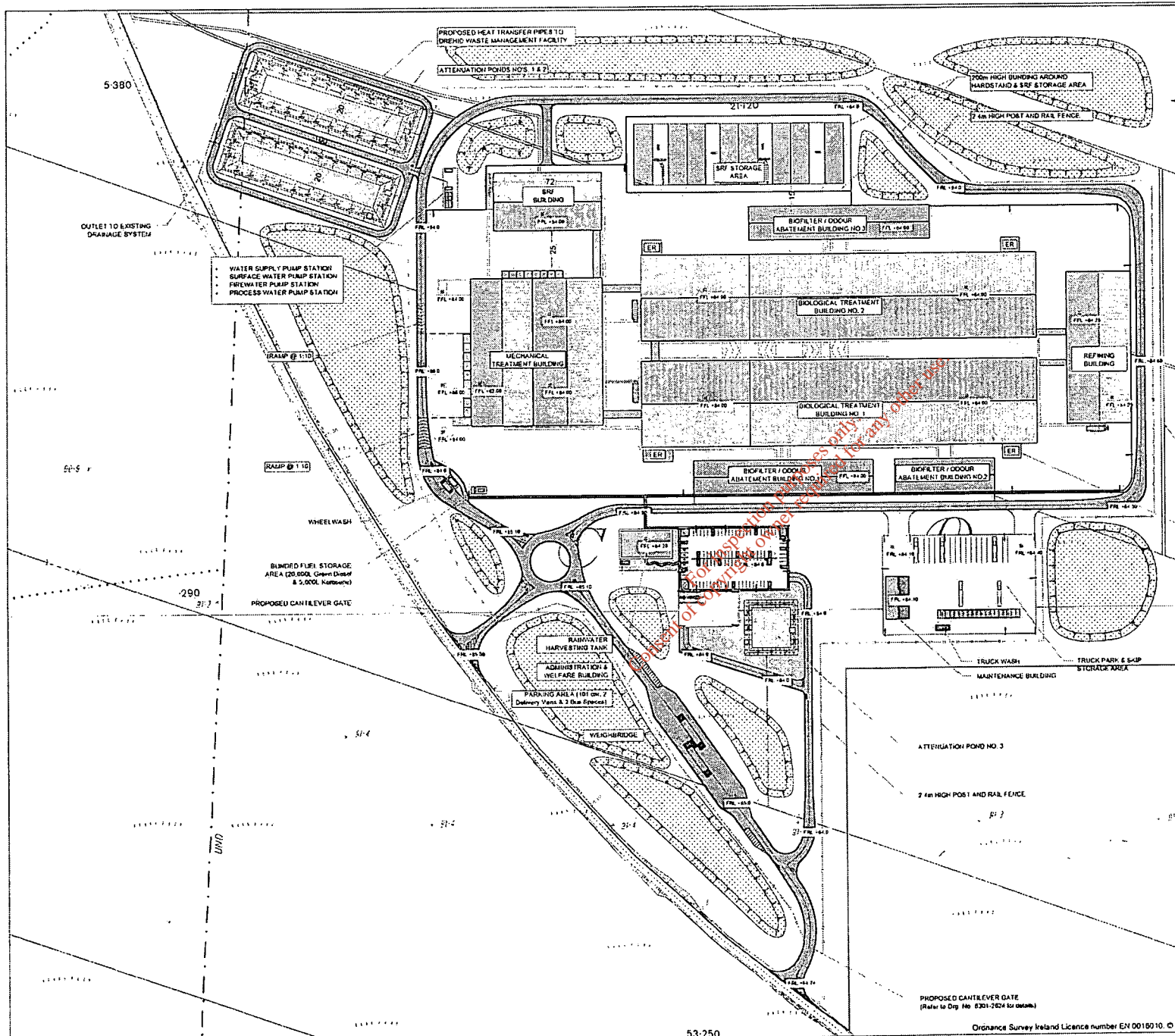
Infrastructural Element	Activity	Timeframe
Mechanical Treatment Building	Removal of 5,559 tonnes of solid waste to a waste disposal/recovery facility.	Within 1 month following closure
	Decommissioning and decontamination of plant and equipment.	
	Removal of plant and equipment.	
	Decontamination of the building and structures.	
Outdoor SRF Storage Area	Removal of 4,000 tonnes of solid waste to a waste disposal/recovery facility.	Within 6 months following closure
	Decontamination of the structure.	

OBJECTION TO THE PROPOSED DECISION

Grounds for Objection To Condition 8.5.6

As noted in Section 2.2.10 of the EIS that accompanied the Waste Licence Application, baled and plastic wrapped Solid Recovered Fuel (SRF) will be stored in an outdoor storage area. This storage area will comprise of a bunded concrete area and the SRF will be stored in wrapped bales approximately 1m³ in size and four bales high. The logistics associated with the shipping of SRF overseas will necessitate the storage of SRF for periods far in excess of 48 hours or 72 hours.

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GENERAL LEGEND

ACTIVITY BOUNDARY ————

PROPOSED CHALKLINE FENCE ————

PROPOSED ROAD ————

PROPOSED HARDSTAND ————

PROPOSED ATTENUATION POND ————

PROPOSED GREEN AREA ————

PROPOSED BUILDINGS ————

FINISHED ROAD LEVEL — FRL +105.1

FINISHED FLOOR LEVEL — FFL +114.05

PROPOSED LANDSCAPED SCREENING BERRI ————

- NOTES**
1. FRAMED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING
 2. ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
 3. SURFACE ELEVATIONS REPRESENTATIVE, AS APPROPRIATE, TO BE INFORMED BY THE CONTRACTOR OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES
 4. THE CONTRACTOR SHALL UNDERTAKE A THOROUGH CHECK FOR THE ACTUAL LOCATION OF ALL SERVICES (PIPES, ABOVE AND BELOW GROUND, BUT ONLY ANY WORK COMMENCES
 5. ALL ELEVATIONS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MAMBI HEAD

Sheet				
A	27 m ID	THOUGHTBY MARKET PLACE	M 10	012
Scale	Scale	Scale 1:500	FL	Cont

Client

BORD NA MÓNA

Project

DREHID MECHANICAL BIOLOGICAL TREATMENT (MBT) FACILITY

Title

SITE LAYOUT PLAN

Scale of A3: 1:2,500

Prepared by: M. Nolan

Checked: O. Conneran

Date: May 2012

Project Director: D. Glehan

TOBIN

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Drawing No: Figure 2.2

Sheet: A

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