
Revised & Updated Non-Technical Summary

This non-technical summary has been revised and updated in response to a letter received from the Environmental Protection Agency, dated 13th August 2014, requesting further information to substantiate Industrial Emission Licence Application W0286-01. This revised non-technical summary provides updated information in section 9 (2) n. This revised non-technical summary has been produced in order to comply with Article 9 (2) (w) *include a non-technical summary of information provided in relation to the matters specified in subparagraphs (c) to (x) of this paragraph*. The required information is summarized below.

9 (2) (b) (c) *specify the relevant class or classes in the First Schedule to the Act of 1992 to which the industrial emissions directive activity relates,*

The classes of activity in accordance with the First Schedule of the Act of 1992, as amended by the European Union (Industrial Emissions) Regulations 2013, to which the application relates are:

- 11.1
- 11.2
- 11.6

Additional details are provided in the *Further Information* submission.

9 (2) (d) *in accordance with section 87(1B)(a) of the Act of 1992 in the case where an application for permission for the development comprising or for the purposes of the industrial emissions directive activity to which the application for the licence relates is currently under consideration by the planning authority concerned or An Bord Pleanála, a written confirmation from the planning authority or An Bord Pleanála, as appropriate, of that fact together with either: (i) a copy of the environmental impact statement, 2 hard copies and 2 electronic copies or in such form as may be specified by the Agency, that was required to be submitted with the application for planning permission, or (ii) a written confirmation from the planning authority or An Bord Pleanála that an environmental impact assessment is not required by or under the Act of 2000,*

This application relates to an existing facility for which planning permission has already been granted. An EIS is not required for this application. Additional details are provided in Appendix 2 of the *Further Information* submission.

(e) *in accordance with section 87(1B) (b) of the Act of 1992 in the case where permission for the development comprising or for the purposes of the industrial emissions directive activity to which the application for the licence relates has been granted, a copy of the grant of permission together with either: (i) a copy of the environmental impact statement, 2 hard copies and 2 electronic copies or in such form as may be specified by the Agency, that was required to be submitted with the application for permission, or (ii) a written confirmation from the planning authority or An Bord Pleanála that an environmental impact assessment was not required by or under the Act of 2000,*

This application relates to an existing facility. Planning permission has already been granted for the facility. *Local Authority Planning File Reference No: SA/30449 - 23/12/2003 & SA/60204 - 03/05/2006*. An EIS is not required for this application as detailed above and in the *Further Information* submission.

9 (2) (1) *specify the raw and ancillary materials, substances, preparations, fuels and energy which will be produced by or utilised in the activity,*

There are no significant quantities of raw and ancillary materials, substances, preparations, fuels and energy which will be produced by or utilised in the activity. A complete list is provided in *Further Information* submission.

9 (2) (g) describe the plant, methods, processes, ancillary processes, abatement, recovery and treatment systems, and operating procedures for the activity,

The Recycling Village Ltd provides a recycling service for WEEE including TV monitors, PC monitors, mixed WEEE (e.g. hairdryers, toaster, kettles etc), lead acid and other batteries. A description of the plant, methods, processes, ancillary processes, abatement, recovery and treatment systems, and operating procedures for the activity is provided in the *Further Information* submission.

9 (2) (h) indicate how the requirements of section 83(5) (a) (i) to (v) and (vii) to (xa) of the Act of 1992 shall be met, having regard, where appropriate, to any relevant specification issued by the Agency under section 5(3) (b) of that Act or any applicable best available techniques (BAT) conclusions adopted in accordance with Article 13(5) of the Industrial Emissions Directive and the reasons for the selection of the arrangements proposed,

Environmental emissions monitoring surveys that have been carried out at the facility as required by the existing waste permit have shown that there are no adverse environmental impacts from the facility. The Recycling Village Ltd is committed to complying with all relevant emissions quality standards or conditions imposed by the EPA.

The Recycling Village Ltd has invested over €500,000 in recent years to install equipment, infrastructure, processes and procedures to meet and exceed BAT requirements. The Recycling Village Ltd has also invested in developing and implementing a certified ISO 14001 Environmental Management System (EMS). These measures help to ensure that The Recycling Village Ltd continues to produce a high quality recyclable product in a manner that provides a safe and comfortable working environment for employees and helps to protect the environment.

As part of the BAT process, The Recycling Village Ltd has considered published guidance documents including;

- EPA: Final Draft BAT Guidance Note on Best Available Techniques for the Waste Sector: Waste Transfer and Materials Recovery
- BREF on Waste Treatments Industry
- BREF on Emissions from Storage
- REF on The General Principles of Monitoring

The Recycling Village Ltd has developed and implemented a site Emergency Response Plan (ERP) to minimise the impact on the environment of a fire, accidental emission, spillage or emergency. Upon cessation of the site activities, The Recycling Village Ltd would strive to achieve a clean closure of the site. As the facility is located within a purpose built industrial estate it is envisaged that the site, post closure, would be used for further commercial/industrial use. Additional details are provided in the *Further Information* submission.

9 (2) (i) give particulars of the source, nature, composition, temperature, volume, level, rate, method of treatment and location of emissions, and the period or periods during which the emissions are, or are to be, made,

The facility is operated under an existing Waste Permit granted by Meath County Council. The Waste Permit requires The Recycling Village Ltd to implement and carry out a site emissions monitoring programme including:

- Dust deposition
- Yard Water Run-Off
- Noise

In addition to the above, The Recycling Village Ltd also carries out annual Occupational Dust Monitoring, and Stack Emission monitoring to assess emissions to the atmosphere. Tables E.1 (ii) and E.1 (iii) accompany this updated non-technical summary and provide additional details on the source, nature, composition, temperature, volume, level, rate, method of treatment and location of emissions, and the period or periods during which the emissions are, or are to be, made to the atmosphere.

9 (2) (j) *identify monitoring and sampling points and outline proposals for monitoring emissions and the environmental consequences of any such emissions,*

The Recycling Village Ltd propose to monitor the following emissions;

- Air stack emissions
- Dust deposition
- Yard Water Run-Off
- Noise
- Groundwater

Additional details on the monitoring and sampling points and outline proposals for monitoring emissions and the environmental consequences of any such emissions are provided in the *Further Information* submission.

9 (2) (k) (i) *details, and an assessment, of the impacts of any existing or proposed emissions on the environment as a whole, including on an environmental medium other than that or those into which the emissions are, or are to be, made,*

Environmental emissions monitoring surveys that have been carried out at the facility as required by the existing waste permit conditions have shown that there are no adverse environmental impacts from the facility. Where emissions are found to be above relevant standards, The Recycling Village Ltd will take all necessary steps to identify the source/cause of the elevated emissions and take all necessary and reasonable steps to reduce emissions to comply with relevant standards, including implementation of BAT and taking into consideration other Agency guidelines and relevant sources of information. Additional details are provided in the *Further Information* submission.

9 (2) (k) (ii) *details of the proposed measures to prevent or eliminate, or where that is not practicable, to limit, reduce or abate emissions,*

The Recycling Village Ltd has installed and implemented a range of measures to prevent, eliminate, limit, reduce or abate environmental emissions. Additional details are provided in the *Further Information* submission.

9 (2) (l) *describe in outline the main alternatives to the proposed technology, techniques and measures which were studied by the applicant,*

The Recycling Village was established by Director Noel Madden in 2004. Prior to establishing the company, Mr Madden visited recycling facilities throughout Europe and carried out extensive research into the existing technology and processes used to recycle WEEE across the world.

Based on this research, Mr Madden developed and established an alternative, environmentally benign dry glass cleaning process that does not use water or generate effluent. The process produces clean, smooth glass nuggets that are safe to handle, store and transport prior to recycling. Apart from developing an alternative display glass cleaning processes, The Recycling Village Ltd has also developed an environmentally safe way to dismantle and recycle flat screen displays.

The Recycling Village Ltd has invested over €500,000 in recent years to install equipment, infrastructure, processes and procedures to meet and exceed BAT requirements.

The Recycling Village Ltd has also invested in developing and implementing a certified ISO 14001 Environmental Management System (EMS). These measures help to ensure that The Recycling Village Ltd continues to produce a high quality recyclable product in a manner that provides a safe and comfortable working environment for employees and helps to protect the environment.

The WEEE recycling technology, techniques, measures and management system that have been developed and implemented by The Recycling Village Ltd are considered to be BAT in this specialized waste recycling sector.

9 (2) (m) describe the condition of the site of the installation,

Environmental emissions monitoring surveys that have been carried out at the current facility operated by The Recycling Village Ltd as required by the existing waste permit conditions, have shown that there are no adverse environmental impacts from the facility. Additional details are provided in the *Further Information* submission.

9 (2) (n) provide, when requested by the Agency, in the case of an activity that involves the use, production or release of relevant hazardous substances (as defined in section 3 of the Act of 1992) and having regard to the possibility of soil and groundwater contamination at the site of the installation, a baseline report in accordance with section 86B of the Act of 1992,

A baseline soil and groundwater survey was carried out at the site in March 2014. The initial baseline report was reviewed with respect to the *European Commission Guidance concerning baseline reports under Article 22 (2) of Directive 2010/75/EU on Industrial Emissions (2014/C 136/03)*. The review was previously submitted to the EPA.

The results of the initial baseline report have been further reviewed in relation to the EPA publication, 'Guidance on the Management of Contaminated Land and Groundwater at EPA Licensed Sites, 2013'. This review has been submitted to the EPA and main findings are summarized below.

The baseline groundwater results were compared to the groundwater threshold values that are specified in the European Communities Environmental Objectives (Groundwater) Regulations, 2010, SI no 9 of 2010. Where there were no groundwater threshold values in the above Regulations, the groundwater results were compared to the interim groundwater guideline values specified in the EPA publication, 'Towards Setting Guideline Values For The Protection of Groundwater in Ireland – Interim Report'.

The main metals associated with the activities carried out at The Recycling Village Ltd site include cadmium, mercury, lead, nickel and copper. Concentrations of these metals in the groundwater samples were all below the threshold values stated in the European Communities Environmental Objectives (Groundwater) Regulations, 2010, SI no 9 of 2010.

However, the groundwater results exceeded the EC Groundwater Regulations guideline threshold values for the following two parameters;

- Ammonia in BH2 (0.42 mg/l - Threshold 0.15mg/l).
- Sulphate in BH3 (200.63 mg/l - Threshold 187.5mg/l).

Current site activities are unlikely to contribute to levels of ammonia and sulphate in the groundwater, and the baseline soil and groundwater report states that the presence of the low levels of ammonia and sulphate in the groundwater samples could indicate the impact of agricultural activity, (the site is adjacent to agricultural land), or indicate decaying organic matter in the soil, which is further evidenced by the presence of coliform bacteria in the groundwater sample from BH 3.

In addition to ammonia and sulphate, the groundwater results exceeded the guideline threshold values for a number of parameters as specified in the EPA Interim Report. However the EPA threshold guideline values are not proposed restoration target values or clean up levels for groundwater, therefore the review concludes that since the groundwater in the immediate vicinity of The Recycling Village Ltd site is not used as a potable source, there is little likely risk of human health impacts associated with the quality of the groundwater as shown by the laboratory analysis detailed in the baseline report.

The review compared the soil sample results with the following publically available Soil Guideline Value (SGV) Threshold databases;

- UK Environment Agency Soil Guideline Value Thresholds (commercial)
- CL:AIRE Soil Generic Assessment Criteria (2010)
- EPA National Soil Database

Where there were no published SGV's in the UK Environment Agency or CL:AIRE databases, the soil results were compared to the average soil values from the EPA National Soil Database.

The review states that the baseline soil results do not exceed any of the published UK Environment Agency or CL:AIRE SGV thresholds.

The review concludes that based on an assessment of the site groundwater and soil results against available published quality standards, data and thresholds;

- There is no evidence of significant soil or groundwater contamination at the site for the parameters tested for in the baseline survey.
- The soil and groundwater analysis provides a useful baseline against which to assess future soil and groundwater quality investigations at the site.
- A groundwater monitoring programme should be implemented to ensure that conditions do not change over time and that groundwater status is maintained.
- The soil sample results could be used as the baseline to compare any future site closure programme.

9 (2) (o) specify the measures to be taken to comply with an environmental quality standard where such a standard requires stricter conditions to be attached to a licence than would otherwise be determined by reference to best, available techniques,

The Recycling Village Ltd contends that existing emissions monitoring, operating processes, procedures, equipment and the ISO 14001 certified EMS shows that the facility complies with current and relevant environmental quality standards. However, where environmental quality standards require stricter conditions to be attached to a licence than would otherwise be determined, The Recycling Village Ltd will take all necessary and reasonable steps to identify, implement and develop feasible solutions. Additional details are provided in the *Further Information* submission.

9 (2) (p) describe the measures to be taken for minimising pollution over long distances or in the territory of other states,

Monitoring indicates that air emissions from the facility are unlikely to cause pollution over long distances or in the territory of other states. All materials that are sent to other states are 100% recyclable and free from contamination. Additional details are provided in the *Further Information* submission.

9 (2) (q) describe the measures to be taken under abnormal operating conditions, including start-up, shutdown, leaks, malfunctions, breakdowns and momentary stoppages,

As part of the existing site Waste Permit, The Recycling Village Ltd has developed and implemented a site Emergency Response Plan (ERP). Additional details are provided in the *Further Information* submission.

9 (2) (r) describe the measures to be taken on and following the permanent cessation of the activity or part of the activity to avoid any risk of environmental pollution and to return the site of the activity to a satisfactory state or the state established in the baseline report if such is required under section 86B of the Act of 1992,

Upon cessation of the site activities, The Recycling Village Ltd would strive to achieve a clean closure of the site. As the facility is located within a purpose built industrial estate, it is envisaged that the site, post closure would be used for further commercial/industrial use. Additional details are provided in the *Further Information* submission.

9 (2) (s) describe the arrangements for the prevention of waste in accordance with Part III of the Act of 1996, and where waste is generated by the installation, how it will be in order of priority in accordance with section 21A of the Act of 1996, prepared for re-use, recycling, recovery or where that is not technically or economically possible, disposed of in a manner which will prevent or minimise any impact on the environment,

Approximately 95% of all materials handled at the facility, including packaging waste is recycled. Additional details are provided in the *Further Information* submission.

9 (2) (t) specify, by reference to the relevant European Waste Catalogue codes as prescribed by Commission Decision 200015321EC of 3 May 20002, the quantity and nature of the waste or wastes produced or to be produced by the activity, or the quantity and nature of the waste or waste accepted or to be accepted at the installation,

The Recycling Village Ltd currently handles and processes up to 6,000 tonnes of WEEE. This is forecast to increase to up to 15,000 tonnes. WEEE is disassembled, separated and segregated into various material streams for further recycling and processing at facilities off site in Ireland and abroad. Additional details on the type, quantity and nature of the waste accepted and to be accepted at the facility are provided in the *Further Information* submission.

9 (2) (u) state whether the activity consists of comprises, or is for the purposes of an establishment to which the European Communities (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2006 (S.I. No. 74 of 2006) apply,

The Recycling Village Ltd confirms that the European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations, 2006 (SI No. 74 of 2006) do not apply to activities carried out at this facility. Additional details are provided in the *Further Information* submission.

9 (2) (v) describe, in the case of an activity which gives rise, or could give rise, to an emission containing a hazardous substance which is discharged to an aquifer and is specified in the Annex to Council Directive 801681EEC of] 7 December 19793 on the protection of groundwater against pollution caused by certain dangerous substances, the arrangements necessary to comply with the said Council Directive,

The Recycling Village Ltd does not discharge to an aquifer. This section is not applicable.

9 (2) (x) include any other information required under Article 11 of the Industrial Emissions Directive.

No further information is required under Article 11 of the Industrial Emissions Directive. Additional details are provided in the *Further Information* submission.