

Ms Ann Kehoe
Administration Officer
Office of Climate Licensing and Resource
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Wexford.

28th November 2014.

Re; Application for Waste Licence (W0-287-01) Ormonde Organics Ltd, Portlaw, County Waterford

Dear Ms Kehoe

I refer to your request to Ormonde Organics Ltd to provide the information prescribed in Regulation 9 of the EPA (Industrial Emissions) (Licensing) Regulations 2013. The information is set out herein.

9 (1) An application for a licence shall be submitted to the headquarters of the Agency and shall be in such form as may be determined by the Agency which may include electronic submission via the website of the Agency.

9 (2) (a)

(i) *the name, address and telephone number of the applicant and, if different, any address to which correspondence relating to the application should be sent and, if the applicant is a body corporate, the address of its registered or principal office,*

The applicant's details are provided in Section B 1 and Attachment B1 of the Licence Application.

(ii) *the location or postal address (including, where appropriate, the name of the relevant townland or townlands) of the premises to which the activity relates,*

The information is provided in Section B2 of the Licence Application.

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- (iii) *the name of the planning authority in whose functional area the activity is or will be carried on,*

The information is provided in Section B3 of the Licence Application.

- (iv) *in the case of a discharge of any trade effluent or other matter (other than domestic sewage or storm water) to a sewer of a sanitary authority, give the name of the sanitary authority in which the sewer is vested or by which it is controlled,*

There is no discharge of trade effluent or other matter to the sewer of a sanitary authority.

- (b) *give:*

- (i) *in the case of an established activity, the number of employees and other persons working or engaged in connection with the activity on the date after which a licence is required and during normal levels of operation, or*

- (ii) *in any other case, the gross capital cost of the activity to which the application relates,*

There will be 12-15 employees during the normal levels of operation. The capital cost of the activity will be €14M.

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

11.1 The recovery or disposal of waste in a facility, within the meaning of the Act of 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required:

11.4 (b) Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply):

- (i) biological treatment;

As the activity includes both composting and anaerobic digestion, the threshold of 75 tonnes/day applies.

- (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:*

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(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,*

Not applicable,

(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,*

A copy of the planning permission is in Attachment 1. A copy of the Planner's Report on the application is in Attachment B of the Licence Application. A copy of the environmental impact statement, which was submitted with the application for planning permission, was submitted to the Agency with the Licence Application.

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

Details of the raw and ancillary materials, substances preparation, fuels and energy that will be produced and use at the site are provided in Attachment G1 of the Application and in Section 16.5 of the EIS.

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

The relevant information is provided in Attachments C, D, F and H of the Licence Application and Sections 4 and 5 of the EIS.

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- (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,*

An indication of how the requirements of Section 83(5)(a)(i) to (v) and (vii) to (xa) of the Act of 1992 will be met is in Attachment 2. This has 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 presents the reasons for the selection of the proposed arrangements.

- (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 particulars are provided in Attachment E of the Licence Application, including the information submitted in response to Article 14 requests.

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

The existing and proposed emission points and monitoring locations are shown on Drawing No 12193-01 Rev B submitted with the Licence Application. The environmental consequences of the emissions are assessed in Chapters 7, 8, 10, 11 and 14 of the EIS.

- (k) *provide:*

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

The details, and an assessment, of the impacts of the existing and 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, and details of the proposed measures to prevent or eliminate, or where that is not practicable, to limit, reduce or abate emissions are presented in Chapters 7, 8, 9, 10, 11, 12 and 14 of the EIS, the supporting reports in the EIS Appendices and in the response to the Article 14 request for information, which was submitted to the Agency in November 2013.

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

The main alternatives to the proposed technology, techniques and measures studied by the applicant are described in Chapter 3 of the EIS.

- (m) *describe the condition of the site of the installation,*

The condition of the site of the installation is described in the EIS.

- (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,*

Details on the soil and groundwater conditions at the installation are presented in Chapters 7 and 8 of the EIS and the supporting reports in the Appendices.

- (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,*

An EQS does not require stricter condition to be attached to a licence than would otherwise be determined by reference to BAT.

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

Not Applicable.

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

The facility is certified to ISO 14001 Environmental Management System which includes an Emergency Response Procedure (ERP). The current Waste Permit also requires the preparation of an ERP. The procedure ensures a rapid response to any incident by trained staff and minimises the potential impact on the environment of any associated emissions. This will be undated following the issue of the Licence. Ormonde Organics has prepared an Environmental Liabilities Risk Assessment that identifies the 'worst case' scenario for environmental pollution at the facility and this has been submitted to the Agency.

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- (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.*

There is no short or long term proposal to either shut down or decommission all or part of the facility. In the unlikely event that the facility has to close, the shut-down will be carried out in accordance with the actions set out in the Closure Restoration and Aftercare Management Plan submitted to the Agency in November 2013.

- (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,*

As all of these materials are currently classified as waste, the only opportunities for waste prevention relate to the small amounts of office and canteen waste generated in the office and welfare facilities. The facility is designed and operated to maximise the recovery of the materials accepted in a manner that minimises the risk of environmental pollution. Waste oils generated during plant and vehicle maintenance are collected and sent off-site for recovery.

- (t) *specify, by reference to the relevant European Waste Catalogue codes as prescribed by Commission Decision 2000/532/EC of 3 May 2000, 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 quantity and nature of the waste accepted at the installation, by reference to the relevant EWC codes are listed in Attachment H1 of the Licence Application.

- (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 activity is not an establishment to which the Seveso Regulations apply.

- (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 80/68/EEC of 17 December 1979 on the protection of groundwater against pollution caused by certain dangerous substances, the arrangements necessary to comply with the said Council Directive,*

The activity is not one which gives rise or could give risk to an emission containing a hazardous substance which is discharged to an aquifer.

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(w) *include a non-technical summary of information provided in relation to the matters specified in subparagraphs (c) to (x) of this paragraph,*

A Non-Technical Summary is in Attachment 3.

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

Not Applicable

(3) *an application for a review of a licence shall include....*

Not applicable

(4) *An application for a licence shall be accompanied by—*

(a) *a copy of the relevant page of the newspaper in which the notice in accordance with Regulation 5 has been published,*

Not applicable. The Notice required in accordance with Regulation 5 relates to the intention to apply for an Industrial Emissions Licence and refers to the application being available for review after the receipt of same by the Agency. As Ormonde Organics applied for a Waste Licence and this is now being dealt with under transitional arrangements, there is no requirement to submit an IE license application and therefore no requirement to advertise.

(b) *a copy of the text of the site notice erected or fixed on the land or structure in accordance with Regulation 6,*

Not applicable, refer to comments above.

(c) *a copy of the notice given to the planning authority under section 87(1)(a) of the Act of 1992,*

Not applicable. A copy of the letter to Waterford County Council informing it of the intention to apply for a Waste Licence is included in the Licence Application.

(d) *a copy of such plans, including a site plan and location map, and such other particulars, reports and supporting documentation as are necessary to identify and describe—*

(i) *the activity,*

(ii) *the position of the site notice in accordance with Regulation 6,*

(iii) *the point or points from which emissions are made or are to be made,*

(iv) *monitoring and sampling points, and*

Not applicable. Copies of the required plans are included in the Licence Application

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(e) a fee specified in accordance with section 99A of the Act of 1992.

Not applicable. An application fee was submitted with the Licence Application and additional fees are not required.

Yours Sincerely


Jim O' Callaghan

cc Mr Michael Murphy, Ormonde Organics Ltd.

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Attachment 1

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PLANNING & DEVELOPMENT ACTS, 2000 - 2010
NOTIFICATION OF A GRANT OF PERMISSION
WATERFORD COUNTY COUNCIL

To Ormonde Organics Limited
C/o Tom Phillips & Associates
2 - 3 Roger's Lane
Lower Baggot Street
Dublin 2

Tom Phillips & Associates Ltd.	
Rec'd:	23 NOV 2012
Action:	
Project:	

PLANNING REGISTER NUMBER: 11/455

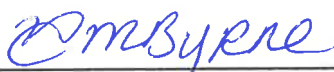
APPLICATION RECEIPT DATE: 18/11/2011

Further to the Notification of the Council's Decision dated: 5th April, 2012

Notice is hereby given that in pursuance of the powers conferred upon them by the above mentioned Acts, Waterford County Council has granted **PERMISSION** to the above named, and subject to the Conditions set out in the Schedule which accompanied the Notification of the Council's decision on above date, for development of land, in accordance with the documents submitted, namely:

for development consisting of the upgrade and extension of an existing Composting Facility (permitted by An Bord Pleanála Ref. No. PL24.215781; Waterford County Council Ref. Ref. PD.04/1831) at a site of 3.2 ha at Killowen, Portlaw, County Waterford. The proposed development will extend the existing site eastwards, increasing the site area to 5.7 ha approximately and will increase the gross floor space of buildings on site by 3,731 sq m from 5,450 sq m to 9,181 sq m. The proposed development comprises activities that require a Waste Licence from the Environmental Protection Agency. An Environmental Impact Statement (EIS) will be submitted to the Planning Authority with this application at Killowen, Portlaw, Co. Waterford.

Signed on behalf of said Council



Planning Department

Date: 8th May, 2012

NOTE:

Development Contributions must be paid prior to commencing the development.

All works must comply with the Building Control Act 1990 & the Building Regulations 1997 – 2002. Please contact the Building Control Section, Fire Station, Kilrush, Dungarvan, Co. Waterford (tel. 058 21146) for further information. *Commencement Notice should be submitted to the Building Control Section at above address.*

(It should be noted that where OUTLINE permission only is granted same is subject to the subsequent Approval of the Planning Authority and until such Approval has been obtained, the development is **NOT AUTHORISED**).

Attachment 2

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BAT Compliance

The European Commission's Reference Document on Best Available Techniques for the Waste Treatment Industries 2006, (BREF) includes BAT for anaerobic digestion and composting plants. This addresses both procedural, design and operational matters, including environmental management systems (EMS); waste acceptance; efficient processing and emission controls.

Section 4.2 describes the Techniques that should be considered in biological treatments. It requires the provision of appropriate waste reception, storage and quarantine area; suitably designed and constructed fermentation vessels and composting bays; screening areas, and the installation of suitable monitoring sensors to monitor the treatment process and confirm that the required operational criteria (for example temperature, moisture content), are achieved.

BAT for Biological Treatment (Anaerobic Digestion and Composting Plants) is described in Section 5.2 of the BREF (BAT 65 to 71) , which deal with the techniques to be applied in the storage and handling of the wastes, in anaerobic digestion, reducing air emissions, improving treatment and reducing emissions.

The proposed design takes into consideration the requirements of Sections 4.2.2, 4.2.4, 5.1 and 5.2 of the BREF. In particular:

- BAT requires the collection and treatment of odorous air from the waste reception area. This will be achieved by a combination of building design and construction; provision of a negative air system and the treatment of the odorous air in appropriately designed and operated treatment plant.
- BAT requires the collection and the appropriate management of wastewater generated from the treatment process. The proposed design includes for the collection and reuse of percolate from the compost process.
- BAT requires all emissions from biological treatment plants to comply with minimum criteria. The emissions from the proposed plant will meet the emission limit values set in the Waste Licence

An assessment of the proposed development against the BREF BAT Conclusions on Waste Management is presented in the Matrix.

BAT 1	BAT is to implement and adhere to an environmental management system (EMS).	Applicable	In place. The facility is certified to ISO 14001 Environmental Management System, ISO 9001 Quality System and OHSAS 18001 and copies of the Certificates are included in the EIS which accompanies the application. The EMS will be updated following the grant of the Waste Licence.
BAT 2	BAT is to ensure the provision of full details of the activities carried out on-site.	Applicable	In place. Described in the Waste Licence Application and the EIS
BAT 3	BAT is to have a good housekeeping procedure in place, which will also cover maintenance and an adequate training programme, covering the preventive actions that workers need to take on health and safety issues and environmental risks.	Applicable	In place. Condition 2.1.8 of the Waste Permit requires the preparation of operational procedures for the installation operation. Condition 2.2.2.8 Condition of the Permit requires a maintenance programme.
BAT 4	BAT is to try to have a close relationship with the waste producer/holder	Applicable	In place. Ormonde Organics regularly liaises with its customers
BAT 5	BAT is to have sufficient staff available and on duty with the requisite qualifications at all times. All personnel should undergo specific job training and further education.	Applicable	In place. Condition 2.1.3 of the Waste Permit requires that the installation is properly manned and supervised and that a suitably qualified and experienced Site Manager is employed. Details are in Attachment C1 of the licence application
BAT 6	BAT is to have a concrete knowledge of the waste IN.	Applicable	In place. Waste acceptance procedure that provides instruction to staff on the types of waste that can be accepted refer to Appendix 4 of the EIS
BAT 7	BAT is to implement a pre-acceptance procedure.	Not Applicable	Given the type of wastes accepted and the types of processing carried out, pre-acceptance procedures are not required for all of the wastes.
BAT 8	BAT is to implement a waste acceptance procedure.	Applicable	In place. Condition 2.1.8 of the Waste Permit requires the preparation of waste acceptance procedures of the Waste Permit requires a detailed inspection of all wastes delivered to the installation and for the preparation of documented waste acceptance procedures. Refer to BAT 6.
BAT 9	BAT is to implement different sampling procedures for all different incoming waste vessels.	Not Applicable	Given the nature of the wastes accepted and the types of processing carried out, sampling procedures are not required.
BAT 10	BAT is to have a reception facility that includes inter alia a quarantine area.	Applicable	In place. Waste inspection and Quarantine area provided, as stipulated by Condition 3.6 of the Waste Permit.

BAT 11	BAT is to analyse the waste OUT according to the relevant parameters important for the facility.	Applicable	In place. Condition 7.4 of the Waste Permit requires Ormonde Organics to maintain records of the nature and composition of all waste consigned from the installation. All wastes consigned are recorded using EWC codes.
BAT 12	BAT is to have a system in place to guarantee the traceability of waste treatment.	Applicable	In place. . Refer to BAT 11
BAT 13	BAT is to have and apply mixing / blending rules.	Applicable	In place. Operational procedure that specified how wastes are mixed
BAT 14	BAT is to have a segregation and compatibility procedure in place.	Applicable	In place. Condition 4.4 of the Waste Permit requires the provision of separate storage and processing areas for sewage sludge and non-sewage sludge wastes.
BAT 15	BAT is to have an approach for improving waste treatment efficiency.	Applicable	In place. Ormonde Organics regularly reviews performance efficiency
BAT 16	BAT is to produce a structured accident management plan.	Applicable	In place. Condition 9.3 of the Waste Permit requires the preparation of an Accident Prevention Plan.
BAT 17	BAT is to have and properly use an incident diary.	Applicable	In place. Condition 7 requires the maintenance of a complaints register
BAT 18	BAT is to have a noise and vibration management plan in place as part of the EMS.	Not Applicable	
BAT 19	BAT is to consider future decommissioning. ¹	Applicable	In place. Condition 10 of the Waste Permit addresses the Closure and Restoration of the installation.
BAT 20	BAT is to provide a breakdown of the energy consumption and generation.	Applicable	In place. Energy consumption is recorded and reported in the AER prepared in compliance with Condition 8.4 of the Waste Permit.
BAT 21	BAT is to continuously increase the energy efficiency of the installation. ²	Applicable	In place. Ormonde Organics reviews energy usage annually
BAT 22	BAT is to carry out an internal benchmarking (e.g. on an annual basis) of raw materials consumption.	Applicable	In place. Ormonde Organics monitors material consumption and reports on same annually in the AER.
BAT 23	BAT is to explore the options for the use of waste as a raw material for the treatment of other wastes.	Not Applicable	Given the nature of the wastes accepted and the types of processing carried out, the use of waste as a raw material in the treatment of other wastes is not applicable.

BAT 24	<i>Storage and Handling</i> ³		
a)	BAT is to ensure storage areas are away from watercourses and sensitive perimeters, and located to eliminate or minimise the double handling of wastes within the installation.	Applicable	In place. Condition 4.6 of the Waste Permit requires that all waste handling and storage is carried out in designated areas that are protected against spillage and leachate run-off. All waste and materials storage areas are away from water courses and sensitive perimeters and positioned to minimise double handling.
b)	BAT is to ensure that the storage area drainage infrastructure can contain all possible contaminated run-off and that drainage from incompatible wastes cannot come into contact with each other.	Applicable	In place. Conditions 3.10 and 5.8 of the Waste Permit requires measures to be put in place to prevent the discharge of polluting substances to surface waters. Such measures include the provision of silt traps and interceptors. The areas where ABP containing wastes are treated is segregated from the non ABP treatment areas.
c)	BAT is to ensure use of a dedicated area/store equipped with all necessary measures related to the specific risk of the wastes for sorting and repackaging laboratory smalls or similar waste.	Not applicable	Laboratory wastes neither accepted nor generated at the installation.
d)	BAT is to handle odorous materials in fully enclosed or suitably abated vessels and storing them in enclosed buildings connected to abatement.	Applicable	In place. Condition 3.14 of the Waste Permit requires the provision of an odour abatement system. Details of existing and proposed odour management systems are described in Section 10.5 of the EIS
e)	BAT is to ensure that all connections between the vessels are capable of being closed via valves.	Applicable	In place.
f)	BAT is to ensure measures are available to prevent the building up of sludge higher than a certain level and the emergence of foams that may affect such measures in liquid tanks.	Applicable	In Place.
g)	BAT is equipping tanks and vessels with suitable abatement systems when volatile emissions may be generated.	Not Applicable	Liquid wastes containing volatile compounds are not accepted at the installation.

h)	BAT is to store organic waste liquid with a low flashpoint under a nitrogen atmosphere to keep it inertised.	Not Applicable	Organic waste liquids with low flash points are not accepted at the installation.
BAT 25	BAT is to separately bund the liquid decanting and storage areas using bunds which are impermeable and resistant to the stored materials.	Applicable	In place. Condition 3.8 of the Waste Permit requires all tank and drum storage areas be bunded, with the bund design to have regard to the Agency's guidelines on the Storage and Transfer of Materials for Scheduled Activities. The Condition also requires that all tanks and pipelines be impervious to the materials contained therein.
BAT 26	<i>Tank and Process Pipework</i>		
a)	BAT is to clearly label all vessels with regard to their contents and capacity.	Applicable	In place. Condition 3.8.5 of the Waste Permit stipulates that all tanks, containers and drums are clearly labelled.
b)	BAT is to ensure the label differentiates between wastewater and process water, combustible liquid and combustible vapour and the direction of flow.	Applicable	Proposed. Surface water gullies and foul water inspection chambers will be colour coded.
c)	BAT is to keep records for all tanks, detailing the unique identifier; capacity; its construction, including materials; maintenance schedules and inspection results; fittings; and the waste types which may be stored / treated in the vessel, including flashpoint limits.	Applicable	In place. Condition 6.8 of the Waste Permit requires the integrity and water tightness of all building structures, tanks, pipelines and containers and their resistance to penetration by water or other materials carried or stored therein to be tested at least once every three years and the results reported to the Local Authority on each occasion. The condition also requires a written record of all integrity tests and any maintenance or remedial work arising from them to be made.
BAT 27	BAT is to take measures to avoid problems that may be generated from the storage/accumulation of waste.	Applicable	In place. Condition 4.9.4 of the Waste Permit stipulates that the quantity of waste accepted on a daily basis shall not exceed the duty capacity of the processing plant. Condition 4.10 requires the immediate removal of all wastes placed on or in the vicinity of the site other than in accordance with the conditions of the Permit.
BAT 28	<i>Waste Handling Techniques</i>		
a)	BAT is to have systems and procedures in place to ensure that wastes are transferred to the appropriate storage area safely.	Applicable	In place. Conditions 2.1.8 and 4.3 of the Waste Permit require the preparation of procedures for all waste operations including waste movement and storage within the installation.

b)	BAT is to have a management system for the loading and unloading of waste in the installation, which also takes into consideration any risks that these activities may incur.	Applicable	In place. GMC has adopted a Waste Management and Control of Non-Conforming Materials Procedure (QEHSPO07), and a procedure for the assessment of risks associated with facility operations (EHSP034).
c)	BAT is to ensure that a qualified person attends the site to check the laboratory smalls, the old original waste, waste from an unclear origin or undefined waste (especially if drummed), to classify the substances accordingly and to package into specific containers.	Applicable	In place. The installation does not have a laboratory??? and does not accept hazardous waste ??????
d)	BAT is to ensure that damaged hoses, valves and connections are not used.	Applicable	In place. Ormonde Organics implements a preventative maintenance programme that includes regular inspection of the AD pipework and connections.
e)	BAT is to collect exhaust gas from vessels and tanks when handling liquid waste.	Applicable	In place. The gases from the AD digesters are collected and used as a fuel in the on-site generators.
f)	BAT is to unload solids and sludge in closed areas which are fitted with extractive vent systems linked to abatement equipment when the handled waste can potentially generate emission to air (e.g. odours, dust, VOCs)	Applicable	In place. Condition 6.20.1 of the Waste Permit requires the provision and maintenance of measures for the control of odour emissions. Condition 3.14.1 requires that a system for the maintenance of integrity of the negative pressure system and biofiltration system shall be installed and maintained throughout the biowaste and biosolid reception and compost processing building(s) to ensure no significant escape of odours.
g)	BAT is to use a system to ensure the bulking of different batches only takes place with compatibility testing.	Not Applicable	Hazardous waste not accepted at the facility.
BAT 29	BAT is to ensure that the bulking /mixing to or from packaged waste only takes place under instruction and supervision and is carried out by trained personnel.	Not Applicable	In place. All waste handling, including baling of the processed metals, is carried out by trained personnel in accordance with documented procedures (EHSP039-Baler Operation: EHSP028 Segregation of Frag Feed and EHSP020 ELV Depollution).
BAT 30	BAT is to ensure that chemical incompatibilities guide the segregation required during storage.	Not Applicable	Chemically incompatible wastes are not accepted at the installation.
BAT 31	<i>Handling of Containerised Waste</i>	Not Applicable	Ormonde Organics does not accept containerised waste
a)	Storing containerised waste under cover		

b)	Making provision for storage of substances that are sensitive to light, heat and water.		
BAT 32	BAT is to perform crushing, shredding and sieving operations in areas fitted with extractive vent systems linked to abatement equipment when handling materials that can generate emission to air (e.g. odours, dust, VOCs).	Applicable	In place. The maturation screening is carried out inside the compost building
BAT 33	BAT is to perform crushing/shredding operations under full encapsulation and under an inert atmosphere for drums/containers containing flammable or highly volatile substances.	Not Applicable	Drums/containers containing flammable or highly volatile substances are not crushed/shredded at the installation.
BAT 34	<i>Washing Processes</i>	Not Applicable	No washing processes carried out at the installation.
a)	BAT is to identify the components that may be present in the items to be washed (e.g. solvents).		
b)	BAT is to transfer washings to appropriate storage and then treating them in the same way as the waste from which they were derived.		
c)	BAT is to use treated waste water from the WT plant for washing instead of fresh water.	Not Applicable	No on-site wastewater treatment plant.
	<i>Air Emission Treatment⁴</i>		
BAT 35	BAT is to restrict the use of open topped tanks, vessels and pits.	Applicable	In place. All tanks used to store liquid wastes and liquid final products are covered.

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BAT 36	BAT is to use an enclosed system with extraction, or under depression, to a suitable abatement plant. This technique is especially relevant to processes which involve the transfer of volatile liquids, including during tanker charging/discharging.	Not Applicable	Volatile liquid waste are not accepted at the facility.
BAT 37	BAT is to apply a suitably sized extraction system which can cover the holding tanks, pre-treatment areas, storage tanks, mixing/reaction tanks and the filter press areas, or to have in place a separate system to treat the vent gases from specific tanks.	Applicable	In place. Suitably sized extraction systems are provided in the AD digester tanks to collect the biogas.
BAT 38	BAT is to correctly operate and maintain the abatement equipment, including the handling and treatment /disposal of spent scrubber media.	Applicable	In place.
BAT 39	BAT is to have a scrubber system in place for the major inorganic gaseous releases from those unit operations which have a point discharge for process emissions.	Applicable	In place Scrubber installed to remove ammonia from the odorous air that is treated in the biofilters.
BAT 40	BAT is to have leak detection and repair procedures in place in installations a) handling a large number of piping components and storage and b) compounds that may leak easily and create an environmental problem.	Applicable	In place. Ormonde Organics has a preventative maintenance programme that includes regular inspection of the pipework and connections in the AD Plant to identify and repair/replace damaged hoses and connections. Condition 6.8 of the Waste Permit require routine integrity testing of underground pipes and tanks that records of same are maintained at the installation. GMC has prepared a procedure on bund integrity testing (EHSP010).
BAT 41	BAT is to reduce air emission to the following levels VOC 7-20mg/Nm ³ and PM to 2-20mg/Nm ³ by using suitable techniques referenced in BAT 35 to 41.	Applicable	Proposed: The BAT air emission levels apply to all waste management facilities and are not specific to biological treatment plants. The objective of BAT emission levels is to ensure the activity does not result in an adverse impact on air quality or breach of a relevant Air Quality Standard. Air emission dispersion modelling has confirmed that the emissions from the installation will not result in an exceedance of an air quality standard.

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	<i>Wastewater Management</i>		
BAT 42	<i>Reduce the water use and the contamination of water</i>		
a)	BAT is to apply site waterproofing and storage retention methods.	Applicable	In place. Condition 4.6 of the Waste Permit requires that all waste storage is carried out in designated areas that are protected against spillage and leachate run-off. Condition 3.8 of requires all tank and drum storage areas be bunded, with the bund design to have regard to the Agency's guidelines on the Storage and Transfer of Materials for Scheduled Activities and that all tanks and pipelines be impervious to the materials contained therein.
b)	BAT is to carry out regular checks of the tanks and pits especially when they are underground.	Applicable	In place. Condition 6.8 of the Waste Permit requires the integrity and water tightness of all building structures, tanks, pipelines and containers and their resistance to penetration by water or other materials carried or stored therein to be tested at least once every three years and the results reported to the Local Authority on each occasion. The condition also requires a written record of all integrity tests and any maintenance or remedial work arising from them to be made.
c)	BAT is to apply separated water drainage according to the pollution load (roof water, road water, process water).	Applicable	In place. Condition 3.10.1 of the Waste Permit requires the provision of a separate rainwater collection and drainage system for all buildings on-site which shall include the diversion of all roof water and run-off from all non-contaminated impervious areas of the site. Condition 3.10.2 requires the system to be designed so no contaminated water may enter the surface water drainage system; Condition 3.10.4 provides for the diversion of rainwater to the on-site water storage tanks for use in the process.
d)	BAT is to apply a security collection basin.	Applicable	In place. Planning permission granted for flow attenuation tank (224m ³) tank on the surface water drainage system to regulate the discharge to the river.
e)	BAT is to performing regular water audits, with the aim of reducing water consumption and preventing water contamination.	Applicable	In place. Ormonde Organics reviews water consumption annually as part of the preparation of the Waste Permit AER.
f)	BAT is to segregate process water from rainwater.	Applicable	In place (ref BAT 42c).
BAT 43	BAT is to have procedures in place to ensure that the effluent specification is suitable for the on-site effluent treatment system or discharge.	Applicable	In place. There is no on-site treatment plant, but rainwater run-off from the operational yard passes through silt traps, an oil interceptor and attenuation tanks before discharging to the river. Condition 5.8.1 of the Waste Permit specifies the emission limit values for the run-off.

BAT 44	BAT is to avoid the effluent by-passing the treatment plant systems.	Applicable	In place. All run-off from the operational yards is collected and directed to the silt trap, oil interceptor and attenuation tank before being discharged to the river a controlled rate.
BAT 45	BAT is to have in place and operate an enclosure system whereby rainwater falling on the processing areas is collected along with tanker washings, occasional spillages, drum washings, etc. and returned to the processing plant or collected in a combined interceptor.	Not applicable	
BAT 46	BAT is to segregate the water collecting systems for potentially more contaminated waters from less contaminated water.	Applicable	In place. (Ref BAT 42 c).
BAT 47	BAT is to have a full concrete base in the whole treatment area that falls to internal site drainage systems which lead to storage tanks or to interceptors that can collect rainwater and any spillage. Interceptors with an overflow to sewer usually need automatic monitoring systems, such as pH checks, which can shut down the overflow.	Applicable	In place. Drainage from operational open yards passes through a silt trap, interceptor and attenuation. Outflow from tank is regulated to a maximum discharge rate of 10.9l/s.
BAT 48	BAT is to collect the rainwater in a special basin for checking, treatment if contaminated and further use.	Applicable	In place. A security basin is a mechanism by which contaminated run-off can be contained within the site boundaries. Adequate retention capacity already provided (Ref BAT 42(d)).
BAT 49	BAT is to maximise the re-use of treated waste waters and use of rainwater in the installation	Applicable	In place. There is no on-site process wastewater treatment plant. Condition 3.10.4 of the Waste Permit provides for the diversion of rainwater to the on-site water storage tanks for use in the process.
BAT 50	BAT is to conduct daily checks on the effluent management system and to maintain a log of all checks carried out, by having a system for monitoring the effluent discharge and sludge quality in place.	Applicable	In place. Condition 5.7 of the Waste Permit requires the maintenance of the interceptors on the surface water drainage system. In addition, GMC staff carry out routine inspections of the surface water drains and record the findings.

BAT 51	BAT is to firstly identify waste waters that may contain hazardous compounds, secondly segregate the previously identified wastewater streams on-site and thirdly, specifically treat waste water on-site or off-site.	Applicable	In place. Condition 3.12.1 of the Waste Permit requires the collection of all process water and any contaminated water that may arise at the facility and drainage to enclosed on-site storage tanks/sumps. Condition 3.12.2 requires the screening of all process water prior to entering any enclosed drain/pipe and Condition 3.12.4 requires facilitating the re-use of all process water within the composting process. Sanitary wastewater is separated from the surface water drainage system and is treated in the on-site septic tank.
BAT 52	BAT is to ultimately after the application of BAT number 42, select and carry out the appropriate treatment technique for each type of waste water.	Applicable	In place. Sanitary wastewater is treated in the on-site septic tank. Run-off from operational yards is passed through a silt traps and oil interceptor before being discharged to river. Leachate from the compost process is recirculated and the liquid digestate from the AD plan is landspread.
BAT 53	BAT is to implement measures to increase the reliability with which the required control and abatement performance can be carried out.	Applicable	In place. Condition 6.12 of the Waste Permit stipulates that sampling and analysis of all pollutants as well as reference measurement methods to calibrate automated measurement systems shall be carried out in accordance with CEN-standards. Condition 6.13 requires monitoring and analysis equipment to be operated and maintained in accordance with the manufacturers' instructions so that all monitoring results accurately reflect any emission, discharge or environmental parameter. Condition 6,15 requires all treatment / abatement and emission control equipment to be calibrated and maintained in accordance with the instructions issued by the manufacturer, supplier or installer.
BAT 54	BAT is to identify the main chemical constituents of the treated effluent and to then make an informed assessment of the fate of these chemicals in the environment.	Applicable	In place. Condition 5.8 of the Waste Permit specified emission limit values for the emission to surface water. Table E.7.1 of the Permit specifies the parameters that must be monitored in the emission to surface water. The objective is to ensure the discharge does not impact on the River Suir.
BAT 55	BAT is to only discharge the wastewater from its storage after the conclusion of all the treatment measures and a subsequent final inspection.	Applicable	In place. The run-off from the operational yard only discharges to the municipal foul sewer after having passed through the silt trap and oil interceptor.
BAT 56	BAT is to achieve the following water emission values (ppm) COD 20 – 120 BOD 2 – 20 Heavy metals (Cr, Cu, Ni, Pb, Zn) 0.1 – 1 Highly toxic heavy metals:	Applicable	In place. The emission limit value apply to emissions to surface water. The Waste Permit specifies a BOD limit of 25mg/l and a TSS of 35mg/l.

	As <0.1 Hg 0.01 – 0.05 Cd <0.1 – 0.2 Cr(VI) <0.1 – 0.4		
	<i>Management of Process Related Residues</i>		
BAT 57	BAT is to have a residue management plan as part of the EMS including a) basic housekeeping techniques and b) internal benchmarking techniques.	Applicable	In place. Ormonde Organics has procedures to manage waste arising from site activities, which include canteen and office waste and waste oils.
BAT 58	BAT is to maximise the use of re-usable packaging (drums, containers, IBCs, palettes, etc.).	Applicable	In place.
BAT 59	BAT is to re-use drums when they are in a good working state. In other cases, they are to be sent for appropriate treatment	Applicable	In place. The drums that contain the oils used in the maintenance of the plant and equipment are returned to the suppliers. .
BAT 60	BAT is to keep a monitoring inventory of the waste on-site by using records of the amount of wastes received on-site and records of the wastes processed.	Applicable	In place. Condition 7.4 of the Waste Permit requires Ormonde Organics to keep written records of each load of waste arriving at and / or departing from the facility.
BAT 61	BAT is to re-use the waste from one activity/treatment possibly as a feedstock for another.	Not Applicable	Given the nature of the wastes accepted and the type of processing carried out, there is no opportunity to re-use waste in the on-site activities.
	<i>Soil Contamination</i>		
BAT 62	BAT is to provide and then maintain the surfaces of operational areas, including applying measures to prevent or quickly clear away leaks and spillages, and ensuring that maintenance of drainage systems and other subsurface structures is carried out.	Applicable	In place. Condition 3.5.3 of the Waste Permit requires the provision of impermeable surfaces in designated waste handling and storage areas. Condition 4.6 requires that the loading and unloading of waste material shall be carried out in designated areas protected against spillage and leachate run-off. Any quarantined waste, while awaiting transfer off-site, shall be stored in designated waste quarantine areas, which shall be protected against spillage and leachate run-off.
BAT 63	BAT is to utilise an impermeable base and internal site drainage.	Applicable	In place (Refer to BAT 62).
BAT 64	BAT is to reduce the installation site and minimise the use of underground vessels and pipework.	Applicable	In place. Apart from the silt traps, interceptor and pump sumps on the surface water drainage system and the septic tank there are no underground storage tanks at the installation.

BAT 65	Techniques for handling and storage in biological treatments		
a)	BAT for less odour-intensive wastes, use automated and rapid action doors (opening times of the doors being kept to a minimum) in combination with an appropriate exhaust air collection device resulting in an under pressure in the hall.	Applicable	In place. Waste reception area and composting bays are fitted with an air collection system that results in an under pressure.
b)	BAT for highly odour-intensive wastes, use closed feed bunkers constructed with a vehicle sluice	Applicable	In place. The buildings are under negative air pressure, meaning all odours are maintained within the buildings.
c)	BAT is to house and equip the bunker area with an exhaust air collection device.	Applicable	Bunker not provided, but refer to BAT 66 b).
BAT 66	BAT is to adjust the admissible waste types and separation processes according to the type of process carried out and the abatement technique applicable	Applicable	In place. The installation houses composting and AD activities. The type of treatment applied to the incoming materials depends on the nature of the wastes.
BAT 67	Anaerobic Digestion	Applicable	
b)	BAT is to recycle the maximum amount of waste water to the reactor.	Not Applicable	The AD process does not separate out wastewater.
c)	BAT is to operate the system under thermophilic digestion conditions. For certain types of wastes, thermophilic conditions cannot to be reached	Not Applicable	There are multiple substrate inputs to the AD process and thermophilic digestion is too unstable to for the treatment of multiple inputs. Mesophilic digestion is the optimum process for this type of treatment.

d)	BAT is to measure TOC, COD, N, P and Cl levels in the inlet and outlet flows. When a better control of the process is required, or a better quality of the waste OUT, more parameters are necessary for measuring and controlling.	Not Applicable	In place. Output is tested regularly for nutrient management plan purposes.
e)	BAT is to maximise the production of biogas. This technique needs to consider the effect on the digestate and biogas quality.	Applicable	In place
BAT 68	BAT is to reduce the air emissions of the exhaust gas when using biogas as a fuel by restricting the emissions of dust, NOx, SOx, CO, H2S and VOC by using an appropriate combination of the following techniques a. scrubbing the biogas with iron salts b. using de-NOx techniques, such as SCR c. using a thermal oxidation unit d. using activated carbon filtration.	Applicable	In place Activated carbon filtration treatment system installed

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Attachment 3

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