

Obj 184-1



# ATLAS

ENVIRONMENTAL PROTECTION AGENCY  
20 OCT 2003

Environmental Protection Agency  
P.O. Box 3000  
Johnstown Castle Estate  
Co. Wexford

Environmental Protection Agency  
Waste Licensing  
Received 24 OCT 2003  
Initials.....

17<sup>th</sup> October, 2003

## Objection to Proposed Decision - 184-1

Dear Sir/Madam,

We have reviewed the proposed Waste Management license which will replace our existing IPC license and facilitate a greater range of activities at the facility. On the whole we find the proposed license to be very comprehensive and well put together, however there are a number of issues that are considered too restrictive or impractical which we wish to object to and seek an alternative resolution.

The grounds for such an appeal are as follows:

**GROUND 1: Schedule A** which relates to **condition 1.4** on wastes acceptable at the facility.

As part of the application Atlas provided the Agency with a very detailed list of wastes which it envisaged handling through the facility however it was not envisaged that this would be directly transcribed into the actual license. The implications of direct transcription would prohibitively restrict the growth of the business and in meeting customers requirements. This is particularly the case in relation to wastes using the site as a transfer station for onward shipment to other appropriately licensed facilities. For example staging wastes from smaller existing Atlas customers to provide better access to other licensed facilities (particularly now that Shannon Environmental Services is part of the DCC group). We would suggest varying the Schedule to the headings in table 1.

In addition the volumes estimated were based on envisaged business growth not site capability/infrastructure. As an existing licensed site our estimated volumes of waste that will have been handled for the calendar year 2003 are given in table 1. The existing site infrastructure has been proven to be capable of handling these volumes in compliance with the existing IPC license conditions and therefore the revised figures are more reflective of the facility's capability and market growth. It should be noted that the overall quantities of wastes being handled are relatively low for a large waste facility. Some provision therefore is

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recommended in the license to permit increasing licensed waste volumes subject to the Agency being satisfied that the necessary infrastructure is in place.

**Table 1. Proposed Revised Schedule A**

<u>Hazardous Waste</u>	<u>Estimated 2003 quantity (Tonnes)</u>	<u>Suggested MAXIMUM (TONNES PER ANNUM in 2004)</u> <sup>Note 1</sup>	<u>MAXIMUM (TONNES PER ANNUM in 2007)</u> <sup>Note 1</sup>
Waste Oil & Hydrocarbon contaminated liquids/sludges	25,300	30,000	35,000
Contaminated Soil	30,000	35,000	50,000
Oil Filters	510	750	1000
Other hazardous wastes	600	5,000	20,000
<b>Total Hazardous</b>	<b>56,410</b>	<b>70,750</b>	<b>106,000</b>
<b>Non-Hazardous Wastes</b>			
Sludge (Drying)	0	6,000	25,000
Other non-hazardous Wastes	0	5,000	15,000
<b>Total Non-Hazardous</b>		<b>11,000</b>	<b>40,000</b>

**GROUND 2. Condition 1.5** states that no hazardous sludges are acceptable at the facility.

Currently the facility accepts and treats hazardous sludges e.g. oily sludges, interceptor sludges and tank bottoms. It is suggested that this condition be deleted and waste acceptance be controlled through the relevant waste acceptance procedures subject to agreement by the Agency.

**GROUND 3. Condition 1.6.3** states that no waste is to be accepted on Sundays or Bank Holidays.

Currently there is a requirement to provide a service to collect waste oil from ships on both Sundays and Bank holidays. In addition Atlas deal with a large number of spills/emergencies which can involve wastes being delivered to the site on these days and occasionally after hours. While this is not a significant volume of business the requirement to provide it is important both for the customers involved and the protection of the environment.

**GROUND 4. Condition 3.9.1** requires a wheel wash (constant recycle system) wheel shake as described in Attachment D.1.d & D 1.e of the application.

No wheel shake facility was described in the attachment referred to nor can one be added to the existing system. It is suggested that the condition be rephrased to require "an adequate system of wheel cleaning be provided in agreement with the Agency".

**GROUND 5. Condition 3.13.7** As it is currently stated this condition would disallow the digging out of vacuum tankers in this area. It is an operational requirement to routinely dig out solid residues from vacuum tankers. This involves parking the tanker in a bunded area and opening the rear door of the tank compartment. Upon opening there is a release of trapped liquids and sludges which cannot be otherwise pumped out. It is not proposed to store this material loose in the bay but to allow the liquid to drain free and be pumped to the processing tanks. Solid residues are then placed in the appropriate containers for subsequent licensed recovery disposal. Therefore direct placement into containers is not practical, and staging of the wastes in this area is required prior to placement in the appropriate container.

**GROUND 6. Conditions 5.2.2 & 5.3.3** relate to waste acceptance procedures and refer directly to attachment E3 as provided in the application. It may be necessary to amend the existing waste acceptance procedures subject to agreement with the Agency. This is also reflected in our objection in Ground 1, where some scope to modify the range of acceptable wastes is envisaged. Therefore the specific references to E3 in the actual license is considered too restrictive and should be further qualified with the phrase "or otherwise agreed with the Agency".

**GROUND 7. Condition 7.8.1 & 7.8.2** require covering of soils and limited stockpiling.

Both of these conditions are more appropriate to outdoor treatment of contaminated soils. Elsewhere in the license condition 3.14.1a requires the soil remediation area to be roofed and condition 3.14.1e also permits for the control of odour. It is requested that both of these conditions (3.14.1 a & e) be deleted as they are considered not appropriate and these other license requirements adequately permit Agency control of these issues.

**GROUND 8. Condition 8.8.1**

This condition is a duplication of condition 7.1 and should be deleted.

**GROUND 9. Condition 11.3d**

It is requested that specific reference to the high pressure briquetting operation be omitted as it is intended to replace this process with an improved method of processing subject to approval by the Agency.

**GROUND 10. Condition 12.1**

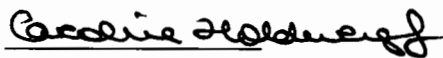
The annual contribution toward the cost of monitoring would seem somewhat excessive in comparison the existing fee of €9357 for 2003 paid under the existing IPC licensing regime. While it is accepted that there is a proposed increase in activities the fees appear to have increased disproportionately.

**GROUND 11. Schedule C.3 & D.4**

The inclusion of mineral oil in addition to Fats, Oils & greases regarding surface water monitoring is considered unnecessary. Oils, fats & greases (OFG) would by it's definition include this fraction. Atlas have invested significantly in expanding our range of analysis but have no capability to carry out a mineral oil test (while we have the capability to carry out OFG analysis). The additional expense is considered unnecessary and should be omitted.

If you have any queries regarding this matter or would like to discuss it further please do not hesitate to contact me

Yours faithfully



Caroline Holdwright  
Environmental, Health & Safety Manager