Ms. Huijing Ling
Lawlor Brothers (Waste Disposal) Limited,
trading as Access Skip Hire
John F Kennedy Road
Unit 28 JFK Industrial Estate
Naas Road
Dublin 12

12th April 2016 Reg. No. W0227-01

Re: Proposed Technical Amendment to licence Reg. No. W0227-01

Dear Ms. Ling,

The Agency, in accordance with Section 96(1) of the Environmental Protection Agency Act 1992 as amended, proposes to amend the licence granted to Lawlor Brothers (Waste Disposal) Limited, trading as Access Skip Hire, referenced above, in respect of the installation located at Unit 28, John F. Kennedy Road, JFK Industrial Estate, Naas Road, Dublin 12 and is minded to insert the conditions detailed in Appendix I, in order to bring the licence into line with the Agency's current *modus operandi* for addressing fire risk at Waste Transfer Stations.

It is appropriate, in accordance with Section 96(2) of the Environmental Protection Agency Act 1992 as amended, to consult with the holder of the licence before the amendment is made. If you require clarification please contact the undersigned at 053-9160600. If you wish to comment on the proposal, please make a written submission by 22nd April 2016.

Yours sincerely,

Michelle Reddy

Licensing Inspector
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Wexford

## Appendix I

**Condition <<XX>>. Materials Handling**

**<<X.1>>**Waste Storage

**<<X.1.1>>** Unless otherwise agreed by the Agency, the maximum quantity of waste stored at the installation at any one time shall be restricted by the Waste Storage Plan as required under Condition X.1.1.

**<<X.1>>**Waste Storage Plan

**<<X.1.1>>** The licensee shall within six months of the date of this amendment, establish, maintain and implement a Waste Storage Plan for all waste stored at the installation.

**<<X.1.2>>** The Waste Storage Plan shall be adequate to ensure compliance with all conditions of this licence.

**<<X.1.3>>** The Waste Storage Plan shall be to the satisfaction of the Agency at all times.

**<<X.1.4>>** The Waste Storage Plan shall incorporate:

- the recommendations of the Fire Risk Assessment required by Condition **<<XX>>.** of this licence;
- a limit on the total quantity of waste to be stored at the installation at any one time;
- maximum stockpile sizes in designated storage areas including maximum volume, height, length, width and area, and minimum separation distances;
- a limit on the maximum storage or holding period for each type of waste in designated storage areas;
- limitations, as may be necessary, on waste storage arrangements to be used during warm weather to prevent odours arising;
- a drawing or plan of the location of each waste type and the means of storage for each waste type (e.g. as loose waste, baled, in sealed containers);
- details of the drainage system super-imposed on the above drawing or plan; and
- a designated fire quarantine area.

**<<X.1.5>>** Waste storage practices at the installation shall comply with the Waste Storage Plan at all times.

**<<X.1.6>>** Where bales of waste are stored, the licensee shall maintain and implement a bale identity and tracking system. Each bale shall be labelled with:

- its date of production;
- its content and LoW code; and
- the name of the facility where the bale was produced and its licence register number (**<<Reg. No.>>**).

**<<X.1.7>>** Waste accepted or generated at the installation shall be stored only in designated areas that have been identified in the Waste Storage Plan.

**<<X.1.8>>** All designated areas for storage of waste shall be:

- clearly labelled;
- appropriately segregated; and
- visibly or physically delineated by walls, dividers, painted lines or marks on the ground or other methods acceptable to the Agency.

**<<X.1.9>** The Emergency Response Procedure (as required under Condition <<X.X>>) shall include an up-to-date copy of the Waste Storage Plan.

**Condition <<XX>>. Accident Prevention and Emergency Response**

**<<X.1>>** The licensee shall arrange, within three months of the date of grant of this amendment and every three years thereafter or as directed by the Agency, for the completion, by an independent and appropriately qualified consultant, of a fire risk assessment for the facility. The assessment shall examine all relevant factors on site that impinge on fire risk and prevention. The assessment shall have regard to the EPA *Guidance Note: Fire Safety at Non-Hazardous Waste Transfer Stations,* 2013. Any recommendations in the fire risk assessment report shall be implemented by the licensee within six months of the date of this amendment.