

Mr Eoin Buttle
Environmental Engineer
Ballymount Baling Station & Civic Amenity
Ballymount Avenue Upper
Walkinstown
Dublin 24

Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland
Y35 W821

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire
Y35 W821

T: +353 53 9160600
F: +353 53 9160699
E: info@epa.ie
W: www.epa.ie

LoCall: 1890 33 55 99

4th July 2016

Reg No. W0003-03

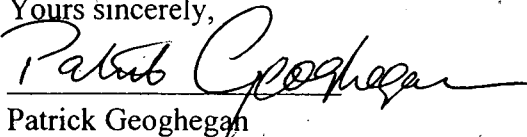
Re: Proposed Technical Amendment to licence Reg. No. W0003-03

Dear Mr Buttle,

The Agency, in accordance with Section 96(1) of the Environmental Protection Agency Act 1992 as amended, proposes to amend the licence granted to South Dublin County Council referenced above, in respect of the installation located at Ballymount Baling Station, Ballymount Road, Walkinstown, Dublin 12 and is minded to insert the conditions detailed in Appendix 1, in order to bring the licence into line with the Agency's current *modus operandi* for addressing fire risk at Waste Transfer Stations, Financial Provision (FP) and Environmental Liabilities Risk Assessment (ELRA).

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 14th July 2016.

Yours sincerely,



Patrick Geoghegan
Senior Inspector
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Wexford

cc. Environment Section, South Dublin County Council, P.O.Box 4122, Town Centre, Tallaght, Dublin 24

Appendix 1

Condition X.1 Waste Storage

- X.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 Y.1.

Condition Y.1 Waste Storage Plan

- Y.1.1 The licensee shall within twelve months of the date of this amendment, establish, maintain and implement a Waste Storage Plan for all waste stored at the installation.
- Y.1.2 The Waste Storage Plan shall be adequate to ensure compliance with all conditions of this licence.
- Y.1.3 The Waste Storage Plan shall be to the satisfaction of the Agency at all times.
- Y.1.4 The Waste Storage Plan shall incorporate:
- the recommendations of the Fire Risk Assessment required by Condition W.1. 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 to prevent odour nuisance;
 - 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 that is;
 - available at all times to aid separation and management of wastes during a fire incident; and
 - is different to the quarantine area set aside for unacceptable wastes.
- Y.1.5 Waste storage practices at the installation shall comply with the Waste Storage Plan at all times.
- Y.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 (W0003-03)
- Y.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.
- Y.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.
- Y.1.9 The Emergency Response Procedure (as required under Condition 9.2) shall include an up-to-date copy of the Waste Storage Plan.

Condition Z.1 Wrapping of baled municipal waste

- Z.1.1 The wrapping of baled municipal waste, RDF, SRF, and other waste shall be carried out in such a manner that:
- the waste is fully enclosed by the wrap;
 - nuisance associated with emission of odour from the wrapped bale is prevented;
 - access by vermin is appropriately controlled and minimised; and
 - the discharge of leachate or other liquids from the wrapped bale is prevented.
- Z.1.2 Bales of waste shall be dispatched from the installation in order of the date of first production of the bale, as labelled in accordance with Condition Y.1.6, unless otherwise agreed with the Agency.
- Z.1.3 The licensee shall maintain and implement documented operating procedures for the baling and wrapping of waste.
- Z.1.4 Stockpiles of wrapped bales and any accessible wrapped bales shall be inspected fortnightly. The integrity of each wrapped bale shall be inspected prior to its dispatch from the installation. Any damaged bales (or those that do not meet the requirements of Condition Z.1.1 above) shall be repaired within 24 hours of damage being detected. No damaged bales shall be dispatched from the installation. Records of these checks and repairs shall be maintained at the installation.

Reason: *To provide for the appropriate handling of material and the protection of the environment.*

Condition W.1. Contingency Arrangements

- W.1 The licensee shall arrange, within six months of the date 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* and the EPA

Guidance on Fire Risk Assessment for Non-Hazardous Waste Facilities, 2016. Any recommendations in the fire risk assessment report shall be implemented by the licensee within twelve months of the date of this amendment.

Reason: *To provide for the protection of the environment.*

Condition V.1. Financial Provisions

- V.1.1 The licensee shall within six months of date of this amendment and to the satisfaction of the Agency, make financial provision to cover any liabilities associated with the operation (including decommissioning/aftercare costs identified in Condition 4: Decommissioning & Residuals Management). The amount of financial provision held shall be reviewed and revised as necessary, but at least annually. Proof of renewal or revision of such financial provision shall be included in the AER.
- V.1.2 The licensee shall have regard to the Environmental Protection Agency's *Guidance on Financial Provision for Environmental Liabilities (2015)* or any amendments thereof and where completed, the baseline report, when implementing Condition V.1.1 above.

Reason: *To provide for adequate financing for monitoring and financial provisions for measures to protect the environment.*

Condition U.1. Environmental Liabilities

- U.1.1 The licensee shall as part of the AER, provide an annual statement as to the measures taken or adopted at the site in relation to the prevention of environmental damage, and the financial provisions in place in relation to the underwriting of costs for remedial actions following anticipated events or accidents/incidents, as may be associated with the carrying on of the activity.
- U.1.2 The licensee shall, to the satisfaction of the Agency, arrange for the completion, by an independent and appropriately qualified consultant, of a comprehensive and fully costed Environmental Liabilities Risk Assessment (ELRA) which addresses the liabilities from past and present activities. The assessment shall include those liabilities and costs identified in Condition 4.2 for execution of the Decommissioning Management Plan (DMP). A report on this assessment shall be submitted to the Agency for approval within six months of date of this amendment. The ELRA shall be reviewed as necessary to reflect any significant change on site, and in any case every three years following initial approval. Review results are to be notified as part of the AER.
- U.1.3 The licensee shall have regard to the Environmental Protection Agency's *Guidance on Assessing and Costing Environmental Liabilities (2014)* or any amendments thereof and where completed, the baseline report, when implementing Condition U.1.2 above.

Reason: *To provide for adequate financing for monitoring and financial provisions for measures to protect the environment.*

