

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

Ceanncheathrú, Bosca Poist 3000 Eastat Chaislean Bhaile Sheain Contae Loch Gairman, Éire 1935-W824

T: +353.53.9160600 F: +353.53.9160699 E: info@epa.ie W: www.epa.ie

LoČall: 1890 33 55 99

15 May 2017

J5 Plaza

Mr Derek Milton

Principal Scientist

Fehily Timoney & Company

North Park Business Park

North Road, Dublin 11

Reg. No.: W0242-02

Dear Mr Milton

I refer to your application for a licence.

Padraig Thornton Waste Disposal Ltd t/a Thorntons Recycling

I am to advise in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, that the following information is required in support of the application under Regulation 9 of the Regulations:

1. General:

- a. Confirm what waste types are proposed to be accepted under the List of Waste codes 03 01 99 (waste not otherwise specified) and 19 12 12 (other waste (including mixtures of materials) from mechanical treatment of wastes, other than those mentioned in 19 12 11).
- b. Elaborate on the detail of the waste treatment activities that are proposed to be carried out under the classes of activity listed in Annex I (Disposal Operations) and Annex II (Recovery Operations) of the Waste Framework Directive, namely DI3, R3, R4 and R5.
- c. Clarify whether any waste is or is proposed to be <u>accepted</u> at the installation for the purposes of treatment for disposal or storage pending disposal elsewhere.

d. Clarify the recovery processes in which it is proposed to utilise the waste wood shredded at the installation.

Wrapped residual waste (SRF) is proposed to be stored in the bale storage shed; however, it has not been proposed to maintain this shed under negative air pressure and to treat the extracted air for odour. State the rationale for proposing that odorous emissions will not arise from municipal waste that has been treated for the removal of organic fractions. Confirm the measures to be taken to prevent odour emissions from this shed.

- f. Confirm how the storage of waste in the main processing building and the bale storage shed has been planned to ensure accident prevention and effective emergency response.
 - Indicate on a drawing the linkages and path between the proposed storm water discharge point SW1, Bachelors Stream and the Tolka River.
- h. Provide details of the applicant's technical knowledge and/or qualifications, along with that of other relevant employees as required by section C.4 of the application form.

Note:

Any *telephone enquiries* in relation to the above should be directed to **Caroline** Murphy at the number above.

All written communications and replies should be directed to Dorota Richards, Office of Environmental Sustainability, EPA, PO Box 3000, Johnstown Castle Estate, County Wexford.

2. Emissions to air:

- a. Confirm if planning permission ref. no. PL06F.P0048 includes permission for a 20m stack from the carbon filter?
- b. Describe how the proposed carbon filter has been designed to enable its operation under the relevant threshold values specified as model input factors in Table 5 of the odour dispersion model.
- Table 5 of the odour dispersion model outlines that an odour concentration of 700 OUE/Nm3 was used as a model input factor; however the discussion above this table states that the odour emission rate was based on an odour concentration of 700 OUE/m3. Confirm which units of measurements were used as an input factor in the model i.e.
- normalised or not normalised.
- d. Figure 2 indicates that there is an odour plume of maximum of 1.5 OUE/m3 at the facility directly north of the proposed installation.
 - i. Confirm if this is the predicted odour plume (Max. 1.5 OU_F/m³) resultant from the model input factors shown in Table 5.
 - ii. Clarify why this same plume reduces to a max. 1.0 OU_E/m³ when combined odour impacts are taken into consideration in Figure 3.

3. Emission to sewer:

- a. Confirm the destination wastewater treatment plant to which the sewer connection is linked.
- b. In the context of article 15(1) of the Industrial Emissions Directive, provide a comprehensive environmental assessment of the impact of the discharge of trade effluent (via SE1) on water quality in the receiving water at the point of its discharge to the receiving water body.
- 4. Baseline report:
 - a. Table 2.2 of the baseline report describes the relevant hazardous substances that will be used at the installation. Confirm if the baseline status of soil and groundwater at the installation demonstrates an absence of these substances.
- 5. <u>BAT:</u>
 - a. Provide an assessment of the Reference Document on BAT on Emissions from Storage (July 2006) as required by section 1.8 of the application form.
- 6. ELRA, closure plan and financial provision:
 - a. Update the ELRA and closure plan to include:
 - i the potential actions and costs required to return the installation to its baseline status;

ii. the cost for removal of the maximum waste storage capacity of each designated storage area to énsure a worst case scenario has been considered.

In addition to the above please also provide an updated non-technical summary to reflect the information provided in your reply.

The requested information should be submitted to the Agency within eight weeks of the date of this notice, in order to allow the Agency to process and determine your application.

۰.

Ser Barris Character In the circumstances, you should make arrangements to have the required documents (1 signed original and 1 copy in hardcopy format, and 2 copies of all files in electronic searchable PDF format on CD-ROM) submitted to the Agency. Your response to this request should be directed to Dorota Richards, Administration Officer, Office Environmental Sustainability.

Note:

Any telephone enquiries in relation to the above should be directed to Caroline Murphy at the number above.

All written communications and replies should be directed to Dorota Richards, Office of Environmental Sustainability, EPA, PO Box 3000, Johnstown Castle Estate, County Wexford.



ental Protection Agency



It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries please contact Ms Caroline Murphy at the number above.

Yours sincerely

aRA Caroline Murphy

Environmental Licensing Programme Office of Environmental Sustainability

Note:

Any telephone enquiries in relation to the above should be directed to Caroline Murphy at the number above. All written communications and replies should be directed to Dorota Richards, Office of Environmental Sustainability, EPA, PO Box 3000, Johnstown Castle Estate, County

Wexford.

A. (a) Second state of the spectra s

1.7