

Patrick Doyle

From: Brian Meaney
Sent: 02 February 2017 14:20
To: Patrick Doyle
Subject: Licence amendment request CR03166
Attachments: Proposed Conditions.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Paddy

Will you please put the message below and the attachment into CRM as part of South Dublin County Council's licence amendment request?

Thanks

Brian.

From: Eoin Buttle [mailto:ebuttle@SDUBLINCOCO.ie]
Sent: 02 February 2017 12:56
To: Brian Meaney
Cc: Joseph Bockarie; Leo Magee
Subject: EPA bulking submission

Dear Brian,

As per our conversation in January, attached is a copy of our TA submission of the existing conditions and the proposed amendments to IED licence W0003-03 for bulking at Ballymount Baling Station.

In the attached document, we have retained the references to the baling and have inserted alternative wording below the identified conditions. The reference to baling has been retained in places to accommodate contingency measures in the event Poolbeg goes down for an extended period and the only alternative is export.

All of the technical amendments to the licence have been reviewed and while Technical Amendment C, which inserts Conditions 5.14 and 5.15 refers to bales, we consider the wording does not have to be changed as it would apply if/when baling occurs. We refer to the Baling Centre as the Waste Treatment Building as this is the terminology the Agency used in Technical Amendment B that inserted Conditions 5.8 to 5.13.

On another note, I am leaving South Dublin County Council. For future correspondence with this matter, please contact either Leo Magee lmagee@sdblincoco.ie or Joseph Bockarie jbockarie@sdblincoco.ie by email or by phone on 01-4149000.

Thank you for your time and work with this matter.

Regards,

Eoin

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Current Licensed Activities

Part I Activities Licensed

In pursuance of the powers conferred on it by the Waste Management Act, 1996, the Agency, under Section 46(2) of the said Act hereby grants this Waste Licence to South Dublin County Council to carry on the waste activities listed below at Ballymount **Baling Station**, Ballymount Road, Walkinstown, Dublin 12 subject to conditions, with the reasons therefor and the associated schedules attached thereto set out in the licence.

Licensed Waste Disposal Activities, in accordance with the Third Schedule of the Waste Management Act 1996

- Class 12. Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule. This activity is limited to the **baling** of Municipal Waste.
- Class 13. Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced. This activity is limited to the storage of waste prior to transporting it to an appropriate facility

Proposed Amendment to Licensed Activities

Part I Activities Licensed

In pursuance of the powers conferred on it by the Waste Management Act, 1996, the Agency, under Section 46(2) of the said Act hereby grants this Waste Licence to South Dublin County Council to carry on the waste activities listed below at Ballymount Waste Management Facility, Ballymount Road, Walkinstown, Dublin 12 subject to conditions, with the reasons therefor and the associated schedules attached thereto set out in the licence.

Licensed Waste Disposal Activities, in accordance with the Third Schedule of the Waste Management Act 1996

- Class 12. Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule. This activity is limited to the bulking and baling of Municipal Waste.
- Class 13. Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced. This activity is limited to the storage of waste prior to transporting it to an appropriate facility.

Current Condition 1.7. Waste Acceptance Hours and Hours of Operation

1.7.1. Baling Station

- (i) The hours of operation shall be 6.30 a.m. to 9.00 p.m. Monday to Saturday inclusive.
- (ii) Waste shall only be accepted between the hours of 6.30 a.m. to 8.00 p.m. Monday to Saturday inclusive.

Proposed Amendment to Condition 1.7. Waste Acceptance Hours and Hours of Operation

1.7.1. Waste Treatment Building

- (i) The hours of operation shall be 6.30 a.m. to 9.00 p.m. Monday to Saturday inclusive.
- (ii) Waste shall only be accepted between the hours of 6.30 a.m. to 8.00 p.m. Monday to Saturday inclusive.

Current Condition 1.8. The following shall constitute an incident for the purposes of this licence:

- a) an emergency;
- b) any emission which does not comply with the requirements of this licence;
- c) any exceedance of the daily duty capacity of the waste handling equipment;
- d) any trigger level specified in this licence which is attained or exceeded;
- e) any breakdown of the baler(s) or associated equipment affecting the baling capacity at the facility; and
- f) any indication that environmental pollution has, or may have, taken place.

Proposed Amendment to Condition 1.8. The following shall constitute an incident for the purposes of this licence:

- g) an emergency;
- h) any emission which does not comply with the requirements of this licence;
- i) any exceedance of the daily duty capacity of the waste handling equipment;
- j) any trigger level specified in this licence which is attained or exceeded;
- k) any breakdown of the waste handling equipment affecting the transfer capacity at the facility; and
- l) any indication that environmental pollution has, or may have, taken place.

Current Condition 3.9.2. The licensee shall install and maintain a negative air pressure and emissions control system in the Waste Reception Area of the Baling Centre as shown in Drawing No. 98054-01-001 Rev.E – Site Layout Plan.

Proposed Amendment to Condition 3.9.2. The licensee shall install and maintain a negative air pressure and emissions control system in the Waste Reception Area of the Waste Transfer Facility.

Current Condition 5.1. Only municipal waste shall be accepted at the Baling Centre. All waste processing shall be carried out inside the Baling Centre.

Proposed Amendment to Condition 5.1. Only municipal waste shall be accepted at the Waste Transfer Facility. All waste processing shall be carried out inside the Waste Transfer Facility.

Current Condition 5.2.3. Subject to Conditions 1.4, 5.2.5 and 9.5, the quantity of waste to be accepted at the Baling Centre over a working day shall not exceed 1,040 tonnes.

Proposed Amendment to Condition 5.2.3. Subject to Conditions 1.4, 5.2.5 and 9.5, the quantity of waste to be accepted at the Waste Treatment Building over a working day shall not exceed 1,040 tonnes.

Current Condition 5.2.5. If the processing of waste is not in accordance with Condition 5.3.5 and/or the floor of the Baling Centre is not being cleared of waste in accordance with Condition 5.4.1, the licensee shall reduce the quantity of waste being accepted at the facility to a level that will ensure compliance with this licence in accordance with any instruction of the Agency.

Proposed Amendment to Condition 5.2.5. If the processing of waste is not in accordance with Condition 5.3.5 and/or the floor of the Waste Treatment Building is not being cleared of waste in accordance with Condition 5.4.1, the licensee shall reduce the quantity of waste being accepted at the facility to a level that will ensure compliance with this licence in accordance with any instruction of the Agency.

Current Condition 5.3.2. Waste arriving at the Waste Reception Area (as shown in Drawing No. 98-054-01-001 Rev.E – Site Layout Plan of the application) shall be deposited on the floor. Only following visual inspection and assessment shall the waste be loaded onto the conveyors for baling. The bales shall be ejected onto waiting trailers which, when fully loaded shall be removed from the facility.

Proposed Amendment to Condition 5.3.2. Waste arriving at the Waste Reception Area (as shown in Drawing No. 98-054-01-001 Rev.E – Site Layout Plan of the application) shall be deposited on the floor. Only following visual inspection and assessment shall the waste be either baled, or bulked up for transfer. The waste shall be placed in waiting trailers which, when fully loaded shall be removed from the facility.

Current Condition 5.3.3. The doors of the **Baling Centre** are to be kept closed as far as is practicable. Unless otherwise agreed with the Agency, the licensee shall provide and maintain heavy duty plastic sheeting along the top of these door openings and which extend as far down as is compatible with the safe passage of facility vehicles through the doorways.

Proposed Amendment to Condition 5.3.3. The doors of the Waste Treatment Building are to be kept closed as far as is practicable. Unless otherwise agreed with the Agency, the licensee shall provide and maintain heavy duty plastic sheeting along the top of these door openings and which extend as far down as is compatible with the safe passage of facility vehicles through the doorways.

Current Condition 5.3.5. Notwithstanding Condition 1.7, all waste accepted into the **Baling Centre for compaction shall be compacted** on the day of acceptance, except where the waste is dealt with in accordance with the contingency arrangements required by this licence.

Proposed Amendment to Condition 5.3.5. Notwithstanding Condition 1.7, all waste accepted into the Waste Treatment Building or transfer shall be transferred on the day of acceptance, except where the waste is dealt with in accordance with the contingency arrangements required by this licence.

Current Condition 5.4.1. The floor of the **Baling Centre** shall be washed down and cleared of all waste at the end of the working day. The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied. **The conveyor belt and balers shall be cleared of all waste at the end of the working day.**

Proposed Amendment to Condition 5.4.1. The floor of the Waste Treatment Building shall be washed down and cleared of all waste at the end of the working day. The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied. **When in use the conveyor belt and balers shall be cleared of all waste at the end of the working day.**

Current Condition 5.6.2. Unless otherwise agreed with the Agency, putrescible household waste accepted at the Civic Waste Facility in accordance with this licence shall be either;

- (i) **compacted at the Baling Centre** on the day of acceptance,
- (ii) removed off site to an alternate facility on the day of acceptance, or
- (iii) in the case of putrescible household waste accepted on a Sunday (or Bank Holidays where the **Baling Centre** is not operational) this waste shall either be deposited into a fully enclosed compactor skip, or if open skips are used these skips shall be covered and transferred into the **Baling Centre** building at the end of the working day.

Proposed Amendment to Condition 5.6.2. Unless otherwise agreed with the Agency, putrescible household waste accepted at the Civic Waste Facility in accordance with this licence shall be either;

- (i) transferred from the Waste Treatment Building on the day of acceptance,
- (ii) removed off site to an alternate facility on the day of acceptance, or
- (iii) in the case of putrescible household waste accepted on a Sunday (or Bank Holidays where the Waste Treatment Building is not operational) this waste shall either be deposited into a fully enclosed compactor skip, or if open skips are used these skips shall be covered and transferred into the Waste Transfer building at the end of the working day.

Current Condition 5.7.3. The licensee shall maintain the **baling** equipment and other plant in accordance with the manufacturers' instructions.

Proposed Amendment to Condition 5.7.3. The licensee shall maintain the waste handling equipment and other plant in accordance with the manufacturers' instructions.

Current Condition 7.7. No waste shall be placed, or allowed to accumulate outside the Waste Reception Area of the **Baling Centre**, except **baled** waste in fully enclosed trailers pending removal from the site, or waste in the Civic Waste Facility which is placed in specified and appropriate containers.

Proposed Amendment to Condition 7.7. No waste shall be placed, or allowed to accumulate outside the Waste Reception Area of the Waste Transfer Facility, except waste in fully enclosed trailers pending removal from the site, or waste in the Civic Waste Facility which is placed in specified and appropriate containers.

Current Condition 9.4 .1. In the event of a complete breakdown of **baling** equipment or any other occurrence which results in the closure of the **Baling Centre**, no municipal waste shall be accepted at the facility until the Baling Centre becomes operational. Any municipal waste on site at the time of the closure shall be removed off site in accordance with this licence. Such a breakdown event will be treated as an emergency and rectified as soon as possible.

Proposed Amendment to Condition 9.4 .1 . In the event of a complete breakdown of baling or bulk transfer equipment or any other occurrence which results in the closure of the Waste Treatment Building, no municipal waste shall be accepted at the facility until the Waste Treatment Building becomes operational. Any municipal waste on site at the time of the closure shall be removed off site in accordance with this licence. Such a breakdown event will be treated as an emergency and rectified as soon as possible.

Current Condition 9.5 Contingency Arrangements for **Baling Centre**

- (i) Contingency arrangements for the **Baling Centre** shall include;
- (a) In the event of a baler becoming inoperable the licensee shall
- immediately calculate the amount of waste already accepted that day at the facility and the amount of waste in the **Baling Centre unbaled.**
 - immediately calculate the amount that the facility can process for the remainder of the working day.
 - remove the waste that cannot be **baled** offsite to an appropriate facility at the latest by the end of the working day.
 - arrange for the diversion of waste to appropriate facilities prior to it arriving at the **Baling Centre** when it cannot process the waste.
- (b) Arrangements with appropriate facilities to accept **unbaled** unprocessed waste removed offsite and waste diverted prior to arrival at the **Baling Centre**. Details of the maximum quantities that such facilities can accept for this purpose should be included.
- (c) No waste shall be accepted at the **Baling Centre when both balers are inoperable.**
- (ii) Within three months of the date of grant of this licence the licensee shall submit a report to the Agency for its agreement on the effectiveness of the contingency arrangements and any recommendations deemed necessary.

Proposed Amendment to Condition 9.5 Contingency Arrangements for Waste Treatment Building

- (i) Contingency arrangements for the Waste Treatment Building shall include;
- (a) In the event of the balers or bulk transfer equipment becoming inoperable the licensee shall
- immediately calculate the amount of waste already accepted that day at the facility and the amount of waste in the Waste Treatment Building.
 - Immediately calculate the amount that the facility can process for the remainder of the working day.
 - remove the waste that cannot be transferred to energy recovery installations offsite to an appropriate facility at the latest by the end of the working day.

arrange for the diversion of waste to appropriate facilities prior to it arriving at the Waste Treatment Building when it cannot process the waste.

(b) Arrangements with appropriate facilities to accept waste removed offsite and waste diverted prior to arrival at the Waste Treatment Building. Details of the maximum quantities that such facilities can accept for this purpose should be included.

(c) No waste shall be accepted at the Waste Transfer Building when the balers or bulk transfer equipment are inoperable.

(ii) Within three months of the date of grant of this licence the licensee shall submit a report to the Agency for its agreement on the effectiveness of the contingency arrangements and any recommendations deemed necessary.

Current Condition 11.3 Unless otherwise instructed by the Agency the licensee shall submit to the Agency a monthly report on the quantities of waste received at the facility and baling details to include the following;

- (i) Daily quantity of waste received at the **Baling Centre**.
- (ii) Daily quantity of waste **baled** at the facility.
- (iii) Details of days and associated quantities of waste transferred from the **Baling Centre** **offsite without baling and to where**.
- (iv) **Details of the hourly operational status of both of the balers i.e. whether operating, on standby, inoperable due to breakdown or inoperable due to scheduled maintenance.**

Proposed Amendment to Condition 11.3 Unless otherwise instructed by the Agency the licensee shall submit to the Agency a monthly report on the quantities of waste received at the facility and baling details to include the following;

- (i) Daily quantity of waste received at the Waste Treatment Building,
- (ii) Daily quantity of waste transferred from the facility to waste recovery installations.
- (iii) Details of days and associated quantities of waste transferred from the Waste Treatment Building to other waste management facilities, including addresses.
- (iv) Details of the hourly operational status of the waste transfer plant and equipment i.e. whether operating, on standby, inoperable due to breakdown or inoperable due to scheduled maintenance.

Current Table A1

Table A.1 Waste Categories and Quantities

WASTE TYPE	MAXIMUM (TONNES PER ANNUM)Note 1
Municipal waste at the Baling Centre	324,480
TOTAL	324,480

Note 1: Subject to Conditions 1.7, 5.2.3 and 5.2.5

Proposed Amendment to Table A1

Table A.1 Waste Categories and Quantities

WASTE TYPE	MAXIMUM (TONNES PER ANNUM)Note 1
Municipal waste at the Baling Centre	324,480
TOTAL	324,480

Note 1: Subject to Conditions 1.7, 5.2.3 and 5.2

Current Schedule E

SCHEDULE E : Recording and Reporting to the Agency

Report	Reporting Frequency Note 1	Report Submission Date
Environmental Management System Updates	Annually	One month after the end of the year reported on.
Annual Environment Report (AER)	Annually	Thirteen months from the date of grant of licence and one month after the end of each calendar year thereafter.
Record of incidents	As they occur	Within five days of the incident.
Bund, tank and container integrity assessment	Every three years	Six months from the date of grant of licence and one month after end of the three year period being
Specified Engineering Works reports	As they arise	Prior to the works commencing.
Monitoring of Surface Water Quality	Quarterly	Ten days after end of the quarter being reported on.
Monitoring of Groundwater Quality	Quarterly	Ten days after end of the quarter being reported on.
Monitoring of Foul water	Quarterly	Ten days after end of the quarter being reported on.
Dust Monitoring	Three times a year	Ten days after the period being reported on
Noise Monitoring	Annually	One month after end of the year being reported on.
PM10 Monitoring	Annually	One month after end of the year being reported on.

Monitoring of Emissions to Atmosphere & Air quality	Quarterly	Ten days after end of the quarter being reported on.
Odour monitoring	Annually	One month after end of the year being reported
Waste quantities received and <u>baling</u> details	Monthly	Five days after the end of each month being reported on.
Any other monitoring	As they occur	Within ten days of obtaining results.

Proposed Amendment to Schedule E

SCHEDULE E : Recording and Reporting to the Agency

Report	Reporting Frequency Note 1	Report Submission Date
Environmental Management System Updates	Annually	One month after the end of the year reported on.
Annual Environment Report (AER)	Annually	Thirteen months from the date of grant of licence and one month after the end of each calendar year thereafter.
Record of incidents	As they occur	Within five days of the incident.
Bund, tank and container integrity assessment	Every three years	Six months from the date of grant of licence and one month after end of the three year period being reported
Specified Engineering Works reports	As they arise	Prior to the works commencing.
Monitoring of Surface Water Quality	Quarterly	Ten days after end of the quarter being reported on.
Monitoring of Groundwater Quality	Quarterly	Ten days after end of the quarter being reported on.
Monitoring of Foul water	Quarterly	Ten days after end of the quarter being reported on.
Dust Monitoring	Three times a year	Ten days after the period being reported on
Noise Monitoring	Annually	One month after end of the year being reported on.
PM10 Monitoring	Annually	One month after end of the year being reported on.
Monitoring of Emissions to Atmosphere & Air quality	Quarterly	Ten days after end of the quarter being reported on.
Odour monitoring	Annually	One month after end of the year being reported on.
Waste quantities received and <u>transferred</u>.	Monthly	Five days after the end of each month being reported on.
Any other monitoring	As they occur	Within ten days of obtaining results.