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Ms Dorota Richards,
Administration Officer,
Office of Environmental Sustainability,
Environmental Protection Agency,
Headquarters PO Box 3000,
Johnstown Castle Estate,
County Wexford.

14th July 2017

Re: Application for Licence Reg No: W0183-02

Dear Ms Richards,

I refer to the Agency's letter dated 26th June 2016 in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013. The requested information is set out herein.

1. *Waste acceptance and operational hours.*

Planning Permission PL 06f.202468 and the EIS note that the installation will accept waste between 6.30 and 20.00 Monday to Saturday; that operational hours will be 07.00 to 19.00; and that waste will not be removed from the facility after 19.00.

The Non-Technical Summary describes the current operational hours as 24 hours/day Monday to Sunday inclusive.

Section C.3 refers to waste acceptance hours of 06.30 — 19.00 Monday to Saturday; operational hours of 6.00 to 20.00 Monday to Saturday; and that the installation does not operate on Sundays or Bank holidays, as per existing licence.

Clarify the proposed periods for waste acceptance and operation at the installation.

Planning Permission PL06f.202468 does not specify waste acceptance and operational hours. Condition 1 of the permission states that the development shall be carried out in accordance with the plans, drawings and particulars (including environmental impact statement) lodged with the application as clarified and amended by the further information received by the planning authority on the 17th day of February, 2003, except as may otherwise be required in order to comply with the following conditions.

The operational hours referenced in the EIS relate to the Materials Recovery Facility. The biological treatment plant, which is also authorised by the planning permission, will, due to the nature of the process, operate continuously 24 hours/day, 7 days a week.

The operational hours described in Section C.3 are incorrect and were included in error. The Agency amended the current licence (Technical Amendment A) in 2006 to allow the acceptance and handling of waste at the facility 24 hours/day Monday to Sunday exclusive and it is not intended to change these waste acceptance and operational hours.

2. *The application states that it is proposed to provide capacity at the installation for the acceptance and treatment of incinerator bottom ash (IBA), commercial & industrial waste, construction & demolition waste and municipal solid waste. Drawing number 1 indicates that the building will have two internal treatment areas.*

- a. *Provide a drawing which clearly indicates, for each waste stream, the proposed location of all waste acceptance, treatment and storage areas.*

A drawing showing the proposed locations for the waste acceptance, treatment and storage is in Attachment 1. For operational reasons it has been decided to locate the IBA processing in the western part of the building with the C&D, C&I and municipal solid waste processing relocating to the eastern side.

- b. *Clarify whether it is proposed to proceed with the construction of the Biowaste Treatment Building. If this building is proposed to be constructed include its location as part of the above drawing.*

For commercial reasons the development of the Biowaste Treatment Building has not proceeded; however it may do so in the future and SEHL wishes to retain authorisation to operate a biological treatment plant. Drawing PP-004, which was submitted with the original licence application and shows the location of the biowaste building, is in Attachment 2.

- c. *Provide a copy of the waste storage plan for the installation. State the maximum amount of waste that can be stored in each area of the installation.*

A copy of the current waste storage plan is in Attachment 3. The plan will be amended to reflect the IBA processing following the grant of the revised licence.

3. *Air handling systems and emissions to air.*

- *Licence Register No. W0183-01 does not authorise emissions to air from the material recovery building.*

The application notes that an internal wall will be raised to roof level to ensure the IBA treatment area is fully separated from the rest of the building.

- *Drawing number 1 indicates that a dust filter is associated with the building and drawing number 2 shows a dust control system.*
- *Drawing number 3 indicates the location of air emission point A2-1.*

a. State whether the Material Recovery Building will require emission points.

As referred to in Attachment E of the review application, there are no point emissions to atmosphere at the installation. While the IBA is unlikely to be a significant source of odours, as a precaution provision has been made for the installation of an odour control unit downstream of the dust filter that is a requirement of current Condition 3.15.2(ii).

The conclusion that the IBA will not be a significant source of odours is based on industry experience, which is reflected in Section 4.6.6 of the BREF on Waste Incineration that states that 'after metals separation, bottom ash may be stored in the open air or in specific covered buildings for several weeks. The storage is generally performed in stockpiles on a concrete floor. Drainage and run-off water are collected for treatment'.

The reasoning for the inclusion of the potential emissions point from the building was that if at some stage in the future odour control measures are required, say as the result of discontinuing the IBA processing and introducing new treatment technologies that are potential sources of odours, this could be facilitated by means of an SEW and not a licence review, which could take many months.

OCM acknowledges that this reasoning was not clearly set out in the application and apologises for the confusion caused. SEHL has no objection to the Agency not approving the request to make provision for an air emission point from the building.

b. State whether there are stacks associated with the emissions points and if they are authorised by the planning authority.

If odour control measures are required at some stage in the future and if these measures require the installation of stacks, SEHL will obtain the appropriate authorisation from the planning authority.

c. Describe the source within the building of any channelled emissions and describe the manner by which the emissions are extracted and directed outside.

OCM assumes channelled emissions relate to the operation of a negative air extraction and treatment system within the building. It is not proposed to install such a system. As referred to in the response to 3a, the dust control system that had been in use at the installation under Condition 3.15.2 of the current licence will be refurbished. The dust filters will be located outside the southern side of the building.

d. Provide a characterisation of any proposed emissions from the proposed processes in the building, to include concentration of relevant parameters and flow rates. Describe any techniques used in accordance with BAT to mitigate the emissions and ensure no environmental pollution is caused.

There will be no point emissions from the IBA processing.

- e. *Provide an air dispersion model to address any channelled emissions from the proposed activities at the installation. Also provide an odour dispersion model to address any channelled emissions from a source that includes food, residual or odour forming waste.*

There are not and will not be any channelled emissions from the proposed IBA processing and, in this context, an air dispersion and odour dispersion models are not required.

- f. *Describe proposed dust mitigation methods to minimise fugitive dust emissions from the IBA treatment area; in particular during the unloading of vehicles in this area.*

As described in Attachment F.1 of the application, when the ash is emptied from the grate in the WtE plant it is quenched with water which means it will be damp (moisture content of between 20 and 25%) when loaded into the transport vehicles.

On arrival at the installation, the IBA will be off-loaded inside the building. As the material will still be damp dust should not be an issue; however as an additional control measure water hoses will be provided to dampen down the materials as required.

Following the removal of the metal the treated IBA will be stored on the building floor until it is loaded into the transport vehicles, which will also occur inside the building. Water hoses will be used to dampen down the stockpiles if required. The use of water hoses is consistent with Section 4.6.6 of the BREF on Waste Incineration, which states 'the stockpiles may be wetted, if required, using a sprinkler or hose system in order to prevent dust formation and emissions'.

Based on the moisture content of the incoming IBA it is unlikely that large volumes of water will be required to dampen the stockpile. The floor drains in the building connect to the foul sewer serving the installation as shown on Drawing No.3 of the application. Prior to the acceptance of the waste the connections between the drains and the foul sewer will be sealed to contain any seepages from the stockpiles inside the building.

4. *Attachment D.2 of application form provides the List of Waste codes proposed for acceptance at the installation.*

- a. *Provide a description of each treatment process into which wastes from each List of Waste Chapter (e.g. 01, 02, 03) will be accepted and where the treated waste outputs are destined for once they're dispatched from the installation.*

The intention of the comprehensive List of Waste codes is to provide the flexibility to accept a wide range of compatible non-hazardous wastes at the installation in the future without the need to seek a licence review. Where such acceptance requires the introduction of a new treatment technology, details will be submitted to the Agency as part of a SEW.

At this time it is not possible to identify the output destinations, but SEHL will comply with Condition 4.5.2 of the current licence, which requires that all waste transferred from the facility is only sent to an appropriate facility agreed by the Agency;

- b. *In the context of Table A.1 of the existing licence (W0183-01) provide a revised list of waste and quantities proposed to be authorised at the installation in a revised licence.*

SEHL considers that the proposed change does not require any alteration to Table A.1. For commercial reasons SEHL requires the flexibility to vary the particular types of compatible non-hazardous wastes, while ensuring that the maximum annual limit of 220,000 tonnes is not exceeded.

5. *Provide a comprehensive review for the Reference Document on the Best Available Techniques for Waste Incineration, August 2006 in relation to the treatment of non-hazardous incineration ash.*

A review to the BREF for Waste Incineration in relation to the treatment of non-hazardous bottom ash is in Attachment 4.

6. *Include details of the technical knowledge and/or qualifications of relevant employees at the installation as required by section C.4 of the application form.*

Attachment C of the application provided details of the overall management structure of SEHL and listed identified current site personnel who are responsible for waste acceptance, handling and licence compliance. CVs of relevant personnel are in Attachment 5.

7. *In accordance with Section 83(6) of the EPA Act 1992, as amended:*

- a. *Prepare a revised, fully detailed and costed Closure, Restoration and Aftercare Management Plan (CRAMP) for the installation as a whole, and to include the proposed activity.*
- b. *Provide a revised, fully detailed and costed Environmental Liabilities Risk Assessment (ELRA) which addresses the liabilities and potential liabilities from the past and proposed activities, including those liabilities and costs identified in the CRAMP.*
- c. *Provide a proposal for financial provision to cover any liabilities associated with the operation and identified in the CRAMP and ELRA.*

The preparation of the CRAMP and ELRA and evaluation of the amount and form of financial provision should have regard to EPA guidance including the Guidance on Assessing and Costing Environmental Liabilities (EPA, 2014) and the Guidance on Financial Provision for Environmental Liabilities (EPA, 2015).

A Revised Decommissioning Management Plan (DMP) and ELRA are in Attachment 6, along with the proposal for financial provision.

8. *Provide an assessment of the predicted noise impact from the operations proposed at the installation.*

An assessment of the noise impact is in Attachment 7.

9. *Confirm if relevant hazardous substances are proposed to be used, produced or released at the installation. If yes, complete a baseline report in accordance with section 86B of the EPA Act 1992, as amended.*

Operations involve the use of diesel and engine oil which are classified as hazardous substances. A baseline report has been prepared and is in Attachment 8.

10. *Complete the following tables of the application form: E.2 (i) Emission Details, E.2(ii), E.3(i) Emission Details, E.5(i), F.1(i) and G.1(ii).*

Tables E.2 (i) Emission Details, E.2(ii), E.3(i) Emission Details, F.1(i) and G.1(ii) have been completed and are in Attachment 9. Table E5(i) has not been completed but an assessment of the noise impacts is in Attachment 7.

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

The updated Non-Technical summary is in Attachment 10.


Jim O'Callaghan