



## THORNTONS RECYCLING

FURTHER INFORMATION PROVISION IN RELATION TO  
IE APPLICATION REF: W0242-02

September 2017

ORIGINAL



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## FURTHER INFORMATION PROVISION IN RELATION TO IE APPLICATION REF: W0242-02

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**Client:** Thorntons Recycling

**Keywords:** Millennium Business Park, industrial emissions application, Environmental Protection Agency

**Abstract:** This report is a further information response to support previously provided information in relation to a request by the Environmental Protection Agency to Thorntons Recycling for further information in accordance with Regulation 10(2)(B)(ii) of the EPA Industrial Emissions (Licencing) Regulations 2013, relating to industrial emissions application W0242-02.

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## 1. INTRODUCTION

This document provides further information to support a response to a request for further information ('Requested Information') regarding a number of issues, from the Environmental Protection Agency (EPA) in relation to the IE application Ref: W0242-02 for a materials processing and transfer facility at the Millennium Business Park, Cappagh Road, Dublin 11, made by Thorntons Recycling.

This document is provided in response to correspondence from the EPA, dated 1<sup>st</sup> September 2017, which relates to Requested Information provided on the 7<sup>th</sup> July 2017 to the Agency.

### 1.1 Specific queries raised by the EPA

3 no. points were identified in the EPA correspondence of the 1<sup>st</sup> September 2017, reproduced as follows:

*Please provide the information requested below in support of your response;*

#### Point 1 - Question 1 (b)

- *Clarify which classes of activity listed in Annex I and Annex II of the Waste Framework Directive, relates to SRF production, the treatment of source segregated 'brown bin' waste and the treatment of green waste.*

#### Point 2 - Question 1 (e)

- *It has been noted that Section D.22 of the application confirms the bale storage capacity at the Bale Storage (excluding the SRF Output Storage) to be 3,500 bales. Taking this into consideration, clarify what measures are proposed to be taken if odour nuisance is created during periods of bale storage in the Bale Storage Building.*

#### Point 3 - Condition 10 of An Bord Pleanála

- *Condition 10 of An Bord Pleanála Decision Ref. No. P06F.PA0048 requires the submission of an Invasive Species Management Plan. Appendix 25 of the EIS describes the proposed measures regarding Japanese knotweed.*

*Taking into consideration the risk of spread of this plant species and its potential to damage concrete surfaces, please clarify why these plants stands are not being removed from the installation.*

## 2. RESPONSE TO POINT 1

- Clarify which classes of activity listed in Annex I and Annex II of the Waste Framework Directive, relates to SRF production, the treatment of source segregated 'brown bin' waste and the treatment of green waste.

The following tables were provided in Chapter 2 of Volume 2 of the EIS submitted with the application to which this submission relates (pages 16 & 17 of Chapter 2), and identify the activities to be undertaken at the proposed facility. These tables, allied to the information provided in Attachment A of the Requested Information previously submitted, identify the facility's proposed activities.

**Table 2-1: Table 2-2 from Chapter 2 of Volume 2 of EIS**

Third Schedule Waste Disposal Activities	
<b>Class D13</b>	Blending or mixing prior to submission to any of the operations numbered D 1 to D 12 (if there is not other D code appropriate, this can include preliminary operations prior to disposal including pre-processing such as, amongst others, sorting, crushing, compacting, pelletising, drying, shredding, conditioning or separating prior to submission to any of the operations numbered D1 to D12)
<b>Proposed Activity Description</b>	<i>This activity relates to the bulking up of residual MSW at the facility prior to consignment offsite for disposal</i>
<b>Class D14</b>	Repackaging prior to submission to any of the operations numbered D 1 to D 13
<b>Proposed Activity Description</b>	<i>This activity relates to the baling of waste which could ultimately be disposed of.</i>
<b>Class D15</b>	Storage pending any of the operations numbered D 1 to D 14 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).
<b>Proposed Activity Description</b>	<i>This relates to the storage of residual MSW accepted at the site prior to consignment offsite for disposal.</i>

Table 2-2: Table 2-3 from Chapter 2 of Volume 2 of EIS

Fourth Schedule Waste Recovery Activities	
<b>Class R3</b>	Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological processes).
<b>Proposed Activity Description</b>	<i>This relates to the reclamation of paper and card from residual MSW during the preparation of SRF</i>
<b>Class R4</b>	Recycling/reclamation of metals and metals compounds
<b>Proposed Activity Description</b>	<i>This activity relates to the recovery of metals from residual MSW during the preparation of SRF</i>
<b>Class R5</b>	Recycling/reclamation of other inorganic materials, which includes soil cleaning resulting in recovery of the soil and recycling of inorganic construction materials.
<b>Proposed Activity Description</b>	<i>This activity relates to the recovery of plastics from residual MSW during the preparation of SRF</i>
<b>Class R12</b>	Exchange of waste for submission to any of the operations numbered R1 to R11 (if there is no other R code appropriate, this can include preliminary operations prior to recovery, including pre-processing such as, amongst others, dismantling, sorting, crushing, compacting, pelletising, drying, shredding, conditioning, repackaging, separating, blending or mixing prior to submission to any of the operations numbered R1 to R11)
<b>Proposed Activity Description</b>	<i>This activity relates to the preparation of SRF from residual MSW.</i>
<b>Class R13.</b>	Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).
<b>Proposed Activity Description</b>	<i>This relates to the storage of all waste materials accepted at the site prior to consignment offsite to respective facilities for further recovery activities.</i>

To respond specifically to the query posed,

- SRF production is identified as relating to Class R12 of the 4<sup>th</sup> Schedule of the Waste Management Act 1996 (as amended)/Annex II of the Waste Framework Directive 2008/98/EC
- Treatment of source segregated 'brown bin' waste, is identified as Class R13 of the 4<sup>th</sup> Schedule of the Waste Management Act 1996 (as amended)/Annex II of the Waste Framework Directive 2008/98/EC, where treatment is defined as per Directive 2008/98/EC <sup>1</sup>
- Treatment of green waste is identified as Class R13 of the 4<sup>th</sup> Schedule of the Waste Management Act 1996 (as amended)/Annex II of the Waste Framework Directive 2008/98/EC, where treatment is defined as per Directive 2008/98/EC

<sup>1</sup> 'treatment' means recovery or disposal operations, including preparation prior to recovery or disposal;

### 3. RESPONSE TO POINT 2

- *It has been noted that Section D.22 of the application confirms the bale storage capacity at the Bale Storage (excluding the SRF Output Storage) to be 3,500 bales. Taking this into consideration clarify what measures are proposed to be taken if odour nuisance is created during periods of bale storage in the Bale Storage Building*

As identified in the previous response, the applicant considers that the potential for odour nuisance resulting from storage of the wrapped bales in the proposed Bale Storage Building is minimal given:

- the processing applied to the SRF material to be stored therein i.e. residual MSW material of (wholly) commercial origin which has been processed to remove potentially odorous fractions, thus significantly reducing odour potential.
- the short duration of storage within the Bale Storage Building, corresponding to cement kiln downtime, of c. 4-8 weeks in a typical year.
- the fact that the SRF material is baled, thus providing individual bale enclosure, which will then be subjected to regular checks of integrity, while being stored within the fully enclosed Bale Storage Building.

A daily check procedure will be developed by the applicant for periods when bales are stored within the Bale Storage Building. Daily inspections will be undertaken by assigned personnel with a checklist to record weather conditions, prevailing wind direction, and detection of any fugitive odours originating from the Bale Storage Building. This procedure will be incorporated into the EMS to be developed for the facility.

Operationally, the 2 no. doors in the Bale Storage Building will remain closed and only open when storing bales or moving them back to the Waste Processing Building for re-processing.

In the unlikely event of odour nuisance occurring while bales are stored within the Bale Storage Building, the following procedures will be adopted:

The stored bales will be inspected to identify if the odour source is limited to a certain section of the building or number of bales – should this be the case, the identified bales will be immediately removed from the Bale Storage Building to the Waste Processing Building, which operates under negative aeration, where they will be reprocessed

#### 4. RESPONSE TO POINT 3

- *Condition 10 of An Bord Pleanála Decision Ref. No. P06F.PA0048 requires the submission of an Invasive Species Management Plan. Appendix 25 of the EIS describes the proposed measures regarding Japanese knotweed.*

*Taking into consideration the risk of spread of this plant species and its potential to damage concrete surfaces, please clarify why these plants stands are not being removed from the installation.*

As identified in the Outline Invasive Species Management Plan, the stands of Japanese Knotweed are located along the eastern boundary of the site, outside of the proposed development boundary and, as such, are not within lands directly controlled by Thorntons Recycling. However, given that the root systems of this plant can extend for up to 7 m from visible plant stands, there remains potential for the plant to impact on concrete and other development elements within the proposed site from the adjacent site.

The Outline Plan identifies areas of infestation within the development site as being treated with herbicides in the first instance, given that the stands are not located within the development boundary. However, the Plan provided within the application is outline in nature and can be subject to review based on 'on the ground' conditions realised - therefore, should the Project Ecologist identified as being present onsite to supervise management activities determine that the removal of stands provides the best option in terms of management of the plant, it may be the case that this will be undertaken.

In such an event, the following shall be undertaken:

- Agreement with the adjoining landowner shall be sought such that permission is granted by the landowner to access his lands (from the Thorntons site) to remove the plant stands – alternatively, agreement may be reached with the landowner whereby they employ a specialist contractor to manage same.
- Once removed, the contaminated soil material may be managed in a dedicated area on the adjacent site, where it will be further treated with herbicide and monitored as required (as the adjacent site is a large quarry, it is considered that there would be significant areas for such a management option).
- Should it be determined that off-site management presents the best option for the excavated soils, this material shall be transported to an approved facility for either deep burial or thermal treatment, in accordance with all permits, approvals and/or legislative guidance.