

# EPA Application Form

## 9.1 Environmental Management Techniques - Attachment

**Organisation Name:**

**Connolly's RED MILLS**

**Application I.D.:**

**LA001443**

*For inspection purposes only.  
Consent of copyright owner required for any other use.*

*Authorisation Application Form*

**Amendments to this Application Form Attachment**

<b>Version No.</b>	<b>Date</b>	<b>Amendment since previous version</b>	<b>Reason</b>
V.1.0	July 2017	N/A	Online application form attachment

*For inspection purposes only.  
Consent of copyright owner required for any other use.*

## **9 Environmental Management Techniques <sup>1</sup>**

### **9.1. Accident Prevention Measures**

#### **Measures to prevent accidental emissions and liabilities**

Incidents and accidents are unplanned events. Emissions from incidents and (major) accidents usually occur within a relatively short time frame but with greater intensity than under normal operating conditions. Incidents such as fire or fuel spillages can result in liabilities such as contaminated soil and groundwater. Proactive risk management reduces the potential for an incident.

Abnormal operating conditions must be managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants or animals, without causing a nuisance through noise or odours, and without adversely affecting the countryside or places of special interest.

The applicant must firstly undertake a risk assessment in accordance with EPA guidance on assessing and costing environmental liabilities. Having identified the key risks, the applicant should populate the following table with the measures to be taken to treat the key risks, e.g., bunding, integrity testing, fire prevention, etc.

The range of measures is dependent on the complexity of the site. Pollution prevention measures may, inter alia, include the following information:

- Conclusions on BAT set out in the EU Reference document on BAT on emissions from storage such as a safety management system; corrosion prevention measures on tanks, etc.
- Details of storage of all raw materials, products and wastes such as segregation, labelling, designation and impervious surface;
- Details of spill or emergency containment measures and structures such as bunds, high level alarms, absorbent materials;
- Details of fire detection and fire-water retention facilities in the event of emergencies or other measures to contain fire-water;
- Details of transport of material within the site, solid, liquid or sludge transported by pipe, vehicle or conveyor; etc.,
- The Agency has published a guidance document on Fire-Water Retention Facilities and on the Storage and transfer of materials.

---

<sup>1</sup> This part of the form collects information on environmental management at the installation/ facility. It seeks to understand the maturity of the management system in terms of knowledge of abnormal operating conditions, prevention and early detection measures and emergency response procedures. The level of detail required in this part of form relates to the environmental risk posed.



### Authorisation Application Form

Describe in the table below existing and/or proposed measures, including emergency procedures, to minimise the impact on the environment of an accidental emission or spillage. (This table should include the measures to be taken under abnormal operating conditions, including start-up, shutdown, leaks, malfunctions, breakdowns and momentary stoppages that will demonstrate that any emission arising will not cause significant environmental pollution)<sup>2</sup>.

Measure	Surveillance Measures		
	Description	Frequency of Surveillance	Method / Standard
ELRA	An ELRA will be introduced at the site as part of Licence Conditions	Reviewed every 3 Years	EPA Standard
DMP	A DMP will be introduced at the site as part of Licence Conditions	Reviewed every 3 Years	EPA Standard
Emergency Response Procedure	There is an ERP in place at site as part of the Surface Water management plan.		
Surface Water Plan	Outlines the inspection procedures with regards to SW on site	Weekly	
Bund Integrity Testing	All Bunds on Site to be integrity tested as part of Site Licence Conditions	Re-tested every 3 Years	
Direct all surface water emissions from the site to the Integrated Constructed Wetlands	No Direct surface water discharge to receiving waters without prior treatment in ICW system	Quarterly Monitoring	

\*add rows to the table as necessary

<sup>2</sup> Information relating to the integrity, impermeability and recent testing of pipes, tanks and bund areas should be included.



### Authorisation Application Form

Outline what provisions have been made to ensure an adequate response to emergency situations outside of normal working hours, i.e., during night-time, weekends and holiday periods (attach additional pages to this document if required):

The site is manned at all times of the day (i.e., 24 hours), and as such there is a person on site to activate the Emergency Response Procedure and contact emergency services if necessary. There is an emergency response procedure included in the surface water management plan for the site.

#### Soil Monitoring Points

Periodic monitoring of soil and groundwater is required having regard to the possibility of soil and groundwater contamination of the site<sup>3</sup>.

Complete the table below with details of soil monitoring locations and in particular where a baseline report has been/is required in accordance with Section 86B of the EPA Act 1992 as amended.

Is periodic soil monitoring proposed at the installation/facility? (Yes/No):

No

Soil Monitoring Point Code	Monitoring Point Grid Ref.	
	Easting <sup>4</sup>	Northing <sup>5</sup>
N/A		

\*add rows to the table as necessary

- 3 Inherent in the monitoring of soil and groundwater is accepting the possible necessity for remediation of the soil / groundwater. Regular monitoring of soil and groundwater provides an early detection of any contaminations.
- 4 Six Digit GPS Irish National Grid Reference
- 5 Six Digit GPS Irish National Grid Reference







## Authorisation Application Form

### Groundwater Parameters

Complete the table below with summary details of the groundwater parameters. (If different parameters are associated with different monitoring points this should be identified in the table below.)

Parameter	Unit	Trigger Level	How was the trigger level determined?	Proposed Monitoring Frequency	Sample Method	Analysis Method / Technique
Sulphate	mg/l	250	SI278 of 2007	Annual	Taken from Tap	Standard
Ammonium	mg/l	0.3	SI278 of 2007	Annual	Taken from Tap	Standard
Nitrite	mg/l	0.5	SI278 of 2007	Annual	Taken from Tap	Standard
pH	pH Unit	>6.5 - <9.5	SI278 of 2007	Annual	Taken from Tap	Standard
Nitrate	mg/l	50	SI278 of 2007	Annual	Taken from Tap	Standard
Alkalinity	mg/l	-	SI278 of 2007	Annual	Taken from Tap	Standard
Conductivity	µs/cm	2500	SI278 of 2007	Annual	Taken from Tap	Standard
Turbidity	NTU	-	SI278 of 2007	Annual	Taken from Tap	Standard
Calcium	mg/l	-	SI278 of 2007	Annual	Taken from Tap	Standard
Magnesium	mg/l	-	SI278 of 2007	Annual	Taken from Tap	Standard
Total Coliforms	MPN/100ml	0	SI278 of 2007	Annual	Taken from Tap	Standard
Sodium	mg/l	200	SI278 of 2007	Annual	Taken from Tap	Standard
Potassium	mg/l	-	SI278 of 2007	Annual	Taken from Tap	Standard
E.Coli	MPN/100ml	0	SI278 of 2007	Annual	Taken from Tap	Standard
Colour	Pt Co	-	SI278 of 2007	Annual	Taken from Tap	Standard
Iron	µg/l	200	SI278 of 2007	Annual	Taken from Tap	Standard
Manganese	µg/l	50	SI278 of 2007	Annual	Taken from Tap	Standard
Cooper	µg/l	2000	SI278 of 2007	Annual	Taken from Tap	Standard
Zinc	µg/l	-	SI278 of 2007	Annual	Taken from Tap	Standard
Phosphorous	mg/l	-	SI278 of 2007	Annual	Taken from Tap	Standard
Lead	µg/l	25	SI278 of 2007	Annual	Taken from Tap	Standard
Total Hardness	mg/l	-	SI278 of 2007	Annual	Taken from Tap	Standard



### Authorisation Application Form

Parameter	Unit	Trigger Level	How was the trigger level determined?	Proposed Monitoring Frequency	Sample Method	Analysis Method / Technique
Total Chlorine	mg/l	-	SI278 of 2007	Annual	Taken from Tap	Standard
Dissolved Solids	mg/l	-	SI278 of 2007	Annual	Taken from Tap	Standard

\*add rows to the table as necessary

For inspection purposes only.  
Consent of copyright owner required for any other use.



## Authorisation Application Form

### Costed Environmental Liabilities Risk Assessment (ELRA)

Indicate if the activity, through pre-application meeting with the Agency or other means, is required to submit a costed ELRA<sup>8</sup> as part of the licence, or licence review application.

Costed Environmental Liabilities Risk Assessment (ELRA) required to be submitted? (Yes/No):

NO

If 'Yes', upload a costed Environmental Liabilities Risk Assessment (ELRA), prepared in accordance with the *Environmental Protection Agency's Guidance on Assessing and Costing Environmental Liabilities (2014)* (select Document Type: 'ELRA' in the application form).

Costed ELRA document filename:

N/A

Indicate your preferred form of financial provision instrument to meet ELRA costings have regard to the Environmental Protection Agency's Guidance on Financial Provision (2015), e.g., Environmental Liability Insurance:

Environmental Liability Insurance

Upload a financial provision proposal have regard to the Environmental Protection Agency's Guidance on Financial Provision (2015) (where required at application /review application stage) (select Document Type: 'Financial Provision Proposal' in the application form)

Financial Provision Proposal filename:

N/A

For inspection purposes only.  
Consent of copyright owner required for any other use.

<sup>8</sup> There is an explicit requirement in EU and Irish law for financial provision for certain activities. The following categories of activities have an ELRA/CRAMP/FP requirement:

1. Landfills (excl. closed L.A. Landfills closed before 16<sup>th</sup> July 2009)
2. CAT A Extractive Waste Facilities
3. High Risk Contaminated Land Facilities
4. All Haz-Waste Transfer Stations
5. Non-Haz WTS (Accepting >50,000 tons/annum)
6. Incineration (incl. co-incineration of hazardous waste)
7. Upper & Lower Tier Seveso Sites
8. Exceptional circumstances associated with the site, e.g., significant ground/groundwater contamination.

Regard should be had by applicants to relevant Agency guidance on these matters.



## Authorisation Application Form

### Closure, Restoration and Aftercare Management Plan (CRAMP)

A restoration/aftercare period will be required where there are on-going environmental liabilities following closure. Applicants are required to describe the existing or proposed measures to avoid any risk of environmental pollution and to return the site to a satisfactory state or the state established in the baseline report where applicable, after the activity or part of the activity ceases operation.

A key measure is the preparation of a Closure, Restoration and Aftercare Management Plan (CRAMP) by the operator, for certain activities<sup>9</sup>. Notwithstanding the requirements of the EC Environmental Objectives (Groundwater) Regulations 2010, S.I. No. 9 of 2010, the closure and restoration/ aftercare target is the site condition at the time of the original application or the baseline report. The applicant shall have regard to the Environmental Protection Agency's Guidance on Assessing and Costing Environmental Liabilities (2014) in the preparation of the CRAMP.

Upload a CRAMP, where applicable (select Document Type: 'Site Closure' in the application form).

CRAMP filename:

N/A

### Costed CRAMP

Indicate if the activity, through pre-application meeting with the Agency or other means, is required to have a CRAMP <sup>9</sup> submitted as part of the licence, or licence review application.

CRAMP required to be submitted at application/licence review application stage? (Yes/No):

No

Indicate your preferred form of financial provision instrument to meet CRAMP costings (where appropriate), e.g., Secured fund, On-demand performance Bond, Parent Company Guarantee, Charge on Property (have regard to the Environmental Protection Agency's Guidance on Financial Provision (2015) on the Agency's website):

State preferred form of financial provision instrument?

<sup>9</sup> There is an explicit requirement in EU and Irish law for financial provision for certain activities. The applicant shall have regard to the Environmental Protection Agency's Guidance in determining CRAMP requirements and on Financial Provision (2015) in making financial provision to cover any liabilities.

The following categories of activities have an ELRA/CRAMP/FP requirement:

1. Landfills (excl. closed L.A. Landfills closed before 16<sup>th</sup> July 2009)
2. CAT A Extractive Waste Facilities
3. High Risk Contaminated Land Facilities
4. All Haz-Waste Transfer Stations
5. Non-Haz WTS (Accepting >50,000 tons/annum)
6. Incineration (incl. co-incineration of hazardous waste)
7. Upper & Lower Tier Seveso Sites
8. Exceptional circumstances associated with the site e.g. significant ground/groundwater contamination.



## Authorisation Application Form

Upload a financial provision proposal (where required) having regard to the Environmental Protection Agency's Guidance on Financial Provision (2015) in making financial provision to cover any liabilities (select Document Type: '**Financial Provision Proposal**' in the application form)

Financial Provision Proposal filename:

N/A

### Cessation of Activity

Where a CRAMP is not required, describe the measures to be taken on and following the permanent cessation of the activity or part of the activity to avoid any risk of environmental pollution and to return the site of the activity to a satisfactory state. (Input your response in the text box below or attach the information in to this attachment).

A Decommissioning Management Plan (DMP) will be developed as part of the site Industrial Emissions Licence Conditions and introduced on site following the initiation of the site licence

### Emergency Response Procedure

Do you have an emergency response procedure (ERP)? (Yes/No)

Yes

Is the ERP compliant with the EPA guidance? (Yes/No)

No

### **9.2. Nuisance**

Complete the table below in relation to each potential nuisance. Identify if the activity may cause or contribute to the type of nuisance in the area of the installation/facility and, where applicable, identify the techniques used to prevent/minimise the nuisance.

Type of Nuisance	Applicable to the activity? (Yes/No/ Not Applicable)	Techniques to prevent nuisances	Where nuisances cannot be prevented, techniques to be used to minimise and reduce nuisances
Odour	No	N/A	N/A
Fire Control	Yes	Proper Fire Control Detection & Suppression Measures on site	Suppression as soon as possible

### Authorisation Application Form

Type of Nuisance	Applicable to the activity? (Yes/No/ Not Applicable)	Techniques to prevent nuisances	Where nuisances cannot be prevented, techniques to be used to minimise and reduce nuisances
Dust	Yes	Cyclones on Emission Points, Dampening yard area to keep dust down during dry periods	Cyclones on Emission Points, Dampening yard area to keep dust down during dry periods
Litter	No	N/A	N/A
Birds	No	N/A	N/A
Mud	No	N/A	N/A
Flies	No	N/A	N/A
Vermin	Yes	Pest control	N/A
Other			

If 'Other' is selected define the other nuisance(s):

**Note:** Odour must also be addressed in the fugitive emissions section of the '7.4 Emissions to Atmosphere – Main and Fugitive' template, where applicable.

For inspection purposes only.  
Consent of copyright owner required for any other use.



### Authorisation Application Form

#### 9.3. Environmental Management System (EMS)

Do you have an environmental management system? (Yes/No)

No

If 'Yes', is the environmental management system accredited? (Yes/No)

No

State the date accreditation was achieved or is expected to be achieved, where applicable:

N/A

State the standard of accreditation achieved:

#### Energy Efficiency

Outline the measures taken to ensure that energy is used efficiently having regard to the relevant decision on BAT conclusions and/or BAT guidance and where appropriate, an energy audit with reference to the EPA Guidance document on Energy Audit should be carried out.

An energy efficiency assessment was completed for the site in 2016

Has an energy audit been carried out? (Yes/No)

Yes

Do you have an energy efficiency management system? (Yes/No)

Yes

If 'Yes', is the energy efficiency management system accredited? (Yes/No)

No

State the date accreditation was achieved or is expected to be achieved, where applicable:

State the standard of accreditation achieved:

For inspection purposes only. Consent of copyright owner required for any other use.

## *Authorisation Application Form*

### **9.4. Hours of Operation**

Provide details of the hours of operation for the installation (hours and days per week, etc.), including:

- (a) Proposed hours of operation. - **24 Hours a day**
- (b) Proposed hours of construction and development works and timeframes. – **N/A**
- (c) For waste activities, the proposed hours of waste acceptance. – **N/A**
- (d) Any other relevant hours of operation expected (e.g., waste handling, etc.). – **N/A**

*For inspection purposes only.  
Consent of copyright owner required for any other use.*



## Authorisation Application Form

### 9.5. Review of a Licence

Where the Office of Environmental Enforcement (OEE) has agreed any variations or adjustments to the conditions or schedules of the existing licence, the licensee must provide details of these agreed variations and adjustments to the existing licence conditions in the table that follows.

An updated, scaled drawing of the site layout (no larger than A3) providing visual information on such adjustments or variations where appropriate should be uploaded in the **site tab** – ‘site plan(s)’ upload.

In the case of once-off assessments/reports required under conditions/schedules of the existing licence the licensee must provide details of those assessments/reports that have been completed and agreed with the OEE or as otherwise agreed, in the table below.

Condition/ Schedule No.	Existing Condition	OEE Agreement Reference	Description

\*add rows to the table as necessary

For inspection purposes only.  
Consent of copyright owner required for any other use.