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RH/14/8133WML16
15 March 2018

**Administration,
Environmental Licensing Programme,
Office of Environmental Sustainability,
Environmental Protection Agency,
Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.**

Dear Ewa,

RE: Article 12 Compliance Request (January 2018) for a Waste Licence Application for Harp Refrigerants Ltd., Unit 2, Whitestown Industrial Estate, Whitestown Road, Tallaght, Dublin 24 (Reg. No.: W0297-01) – Part II

Please find enclosed further information in response to an Article 12 Compliance Request in respect of Waste Licence Application W0297-01 as per your letter of 11 January 2018 and subsequent phone calls.

The responses to the Article 12 Compliance Request are as follows:

1. Provide further details on the air emission from the reclamation plant.

As per our previous submission dated 31 January 2018, the refrigerant gas reclamation process includes a step to remove non-condensable gases from the waste refrigerant using a Cogal Belgium Purger (also referred to as a 'de-nagger').

The Cogal Belgium Purger is the recognised industry method for removing non-condensable gases from refrigerant as part of the reclamation process. The equipment is engineered and provided by Climalife, who are a European wide specialist in the provision of products and services related to refrigeration, air-conditioning and heating.

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AWN Consulting Limited
Registered in Ireland No. 319812
Directors: F Callaghan, C Dilworth,
T Donnelly, T Hayes, D Kelly, E Porter

During the reclamation process, the refrigerant vapour is drawn into the de-nagger and processed by a patented, industry leading cooling method that allows condensable refrigerant (in its liquid form) to be pumped back into a drum whilst non-condensable inert gas is vented to atmosphere.

The non-condensable gas is air (primarily oxygen and nitrogen) which is present in the headspace of a cylinder, drum or tank causing an increase in pressure. The sales specification for virgin refrigerant is <1.5%v/v of air. Reclaimed refrigerant generally has an increased non-condensable gas component and therefore needs to be reduced by the use of the de-nagger.

The non-condensable gases in the refrigerant are present from atmospheric air which gets into refrigeration systems over time, typically during maintenance and during replacement. In this way, the non-condensable gases are taken in from the atmosphere and there is no source for contaminants added from the refrigeration or reclamation process.

The de-nagger is pre-programmed to remove the non-condensable gases until a set point is reached and then it then shuts down. The refrigerant gas is then sampled and, if on grade and in composition, the process will be complete.

As noted in Attachment D.2 of the Waste Licence Application, analysis of the gas using the infrared gas analyser is carried out at every stage in the process. Additionally, samples are taken at set points in the reclamation process. A vapour sample is taken with a 50ml syringe to analyse for non-condensable gases by gas chromatography and a 500g liquid sample is taken in a sample cylinder to analyse for moisture by Karl Fisher Coulometric Titration. The same liquid sample is used to analyse for purity by gas chromatography, high boiling residue by a gravimetric method and acidity and chloride by wet chemical methods. These analysis methods are detailed as reference test methods in Section 5 of the Air-Conditioning & Refrigeration Institute ARI Standard 700-2014 'Specifications for Refrigerants'.

Part 5 of Appendix C to AHRI Standard 700-2014 states that "*Non-condensable gas (NCG) is measured in the vapor space above the refrigerant liquid phase by isothermal gas chromatography using a thermal conductivity detector (TCD) and an external standard calibration. By definition, NCG includes gases such as oxygen and nitrogen (air), carbon dioxide, argon and carbon monoxide. However, in the typical refrigerant sample, air is the only NCG present in significant amounts and the other gases are not routinely analysed.*"

The above text is the industry standard approach to refrigerant gas reclamation and the removal of non-condensable gas from waste refrigerant using the Cogal Belgium Purger is a widely used methodology. The AHRI Standard 700-2014 does not specify the requirement to analyse or monitor the non-condensable gas removed as it is globally accepted that the non-condensable gas is air.

Accordingly, the Environmental Permit issued by Natural Resources Wales for the use of the reclaim system at Harp International UK does not contain any emissions limits or associated monitoring requirements for the air emission. This Environmental Permit (EPR/NP3099FS) is attached as Appendix A for the Agency's reference.

The commissioning phase of the reclamation equipment will include regular sampling and analysis to confirm the removal of non-condensable gases from the refrigerant. These sampling results will be made available to the Agency prior to commencement of operations at the facility.

However, it is not possible to carry out monitoring of the pressure release air vent from the de-nagger. It is a ½" diameter vent and it is not possible to insert a probe into it. Nor is there any reason to. The process is just venting a small quantity of air from the system.

As stated previously, the system works by cooling the gas coming out of the cylinder which condenses the refrigerant and therefore all that is left is air. Given that one tonne 'Material for Reclaim' drums are processed in the reclamation plant and c. 80-97% of this is refrigerant, there is c. 30-200kg of air to be vented intermittently for every tonne processed. Assuming 400 tonnes of refrigerant gases are processed at the facility per annum, that equates to c. 12-80 tonnes of air released per annum or c. 7-49m³/hour (based on the planned hours of operation of the de-nagger). By comparison, a standard bathroom fan will expel c. 85m³/hour.

Note: Appendix C of the RFI Response submitted to the Agency on 31 January 2018 listed this Emission to Atmosphere as a Minor Emission with a point reference of A1-1. It is noted that, in accordance with the emission point standard naming convention, this point reference should actually be A3-1 (Minor Emission). The updated Table E.1(iv) of the Waste Licence Application is attached as Appendix B.

2. Proposed installation of laboratory at Harp Facility.

It was not initially intended to establish a laboratory function at this facility and that gas samples would be sent to the Harp International facility in Wales for analysis. However, Harp have since determined that it will not be viable to send samples to the UK for analysis and wait for results to be returned and have made the decision to establish a laboratory at the facility in Tallaght as part of the approval for carrying out the reclamation activity.

The Site Layout Plan (Figure B6.1) has been updated to identify the proposed location of the lab and is included in Appendix C. The equipment required in this lab will be for analysis of gas as detailed in (1) above and it is anticipated that one additional staff member will be required to carry out lab functions and monitor QA/QC. This operative will be suitably trained and qualified in the handling and testing of refrigerant gases.

There will be no emissions of environmental significance from the laboratory activity.

3. Complete Table E.1(ii) of the Waste Licence Application Form.

Table E.1(ii) of the Waste Licence Application Form is required to be completed for Main Emissions to atmosphere. There are no Main Emissions from the Harp facility.

As per the EPA Licence Application Form Guidance, "*main emissions include all emissions of environmental significance. Where a mass emission threshold is specified in a BAT document, emissions which exceed this threshold prior to abatement are regarded as significant*".

There is no mass emission threshold related to reclamation of refrigerant in any BAT documents and the air emission as described in (1) above is not of environmental significance.

The non-condensable emission from the reclamation process is a Minor Emission and is identified as A3-1. Table E.1(iv) has been updated to reflect this and is included in Appendix B.

4. Provide details of the vent pipe diameter and location of emission

The pipe used for venting the non-condensable air from the de-nagger will be a 1/2" diameter galvanised mild steel pipe. It will be secured to the internal wall of the warehouse and extend out of the roof of the warehouse.

The proposed location of the reclamation plant is shown in Figure B6.1 in the Waste Licence Application Form. This Site Layout Plan has been updated to show the position of the vent pipe and is included in Appendix C.

The approximate co-ordinates of this emission point are: ITM 708117E 726886N.

As agreed with the Agency, this document is being submitted electronically via email to the Agency. If hardcopies or electronic copies (on CD ROM) are required, please do not hesitate to ask.

Please feel free to contact the undersigned should you wish to discuss.

Yours faithfully,



ROBERT HUNT
Senior Environmental Consultant



FERGAL CALLAGHAN
Director

cc. Mr. Noel Williams, Facility Manager – Harp Refrigerants Ltd.

encl. Appendix A – Harp International Ltd. Environmental Permit (EPR/NP3099FS)
Appendix B – Waste Licence Application – Table E.1(iv) (updated 20/02/18)
Appendix C – Site Layout Plan (updated 20/02/18)

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Appendix A – Harp International Ltd. Environmental Permit (EPR/NP3099FS)

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Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2010

Harp International Limited

Gellihirion Industrial Estate
Pontypridd
Rhondda Cynon Taff
CF37 5SX

Permit number
EPR/NP3099FS

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Harp International Limited

Permit number EPR/NP3099FS

Introductory note

This introductory note does not form a part of the permit

The main features of the permit are as follows.

The permit allows the treatment of refrigerant gas including distillation, separation, compression, depressurising and drying. The waste is then bulked up for onward recovery. The permit also allows the temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending recovery or disposal by incineration off site. This now includes up to 5 tonnes of waste refrigerant oil at any one time. Unit H of Gellihirion Industrial Estate was previously added to the original permitted area.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Description	Date	Comments
Site Licence No. 3/91/21 issued	22/10/91	Licence to dispose of waste for CFC recycling facility issued to H.R.P. Refrigerants Limited.
Waste management licence 3/91/24 (formerly Site Licence No. 3/91/21) modified	26/03/99	Condition 14 deleted and replaced with Conditions 14.1 and 14.2. Condition 33 was added.
Waste management licence 3/91/24 modified	01/09/00	Registered office address amended.
Waste management licence 3/91/24 modified	06/09/00	Schedule B and Conditions 18 and 19 deleted and replaced with Schedule B and Conditions 18 and 19. Condition 34 was added.
Waste management licence 3/91/24 modified	12/06/01	Name of licence holder changed to Harp International Limited
EAWML 30051 (formerly Waste management licence 3/91/24) modified	05/12/03	Condition for financial provision deleted.
Variation determined EPR/NP3099FS/V007 (formerly EAWML 30051) (variation and consolidation)	21/11/12	Varied and consolidated permit issued in modern condition format.
Administrative Application EPR/NP3099FS/V008	Duly Made 14/01/13	Administrative variation to add waste codes.
Variation determined EPR/NP3099FS	16/01/13	Varied and consolidated permit issued in modern condition format.

Description	Date	Comments
Application received EPR/NP3099FS/V009	Duly Made 10/06/15	Application to include a New Prescribed Activity following the implementation of the Industrial Emissions Directive. Application also includes D9, D14 and D15 waste codes and extends the site boundary.
Variation EPR/NP3099FS determined	06/07/15	Varied and consolidated permit issued in modern condition format.
Application received EPR/NP3099FS/V010	Duly Made 25/05/16	Application to add storage of waste refrigeration oil to existing activities.
Variation determined EPR/NP3099FS/V010	19/08/16	Varied and consolidated permit issued.

End of introductory note

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Permit

The Environmental Permitting (England and Wales) Regulations 2010

Permit number
EPR/NP3099FS

issued to:
Harp International Limited (“the operator”)

whose registered office is

**Gellihirion Industrial Estate
Pontypridd
Rhondda Cynon Taff
CF37 5SX**

company registration number **02432294**

to operate a regulated facility at

**Gellihirion Industrial Estate
Pontypridd
Rhondda Cynon Taff
CF37 5SX**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
<i>A.M. Lewis</i>	19/08/16

Anna Lewis, Principal Permitting Officer

Authorised on behalf of Natural Resources Wales

Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- (b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Energy efficiency

1.2.1 The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 (a) The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.
- (b) If notified by Natural Resources Wales that the activities are giving rise to pollution, the operator shall submit to Natural Resources Wales for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.
- 2.3.3 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 table S2.1; and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.

- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

Hazardous waste storage and treatment

- 2.3.6 Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.

3 Emissions and monitoring

3.1 Emissions of substances not controlled by emission limits

- 3.1.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.1.2 The operator shall:
- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution, submit to Natural Resources Wales for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.
- 3.1.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.2 Odour

3.2.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.2.2 The operator shall:

- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to odour, submit to Natural Resources Wales for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
- (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

3.3 Noise and vibration

3.3.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.3.2 The operator shall:

- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, submit to Natural Resources Wales for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

3.4 Pests

3.4.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.

3.4.2 The operator shall:

- (a) if notified by Natural Resources Wales, submit to Natural Resources Wales for approval within the period specified, a pests management plan which identifies and minimises risks of pollution, hazard or annoyance from pests;
- (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by Natural resources Wales

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by Natural Resources Wales, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by Natural Resources Wales.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to Natural Resources Wales using the contact details supplied in writing by Natural Resources Wales.

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production /treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4 ; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to Natural Resources Wales, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.
- 4.2.6 The operator shall submit an annual solvent management plan in order to demonstrate compliance with the requirements of the Industrial Emissions Directive, by 31 January each year in respect of the previous year.

4.3 Notifications

- 4.3.1 (a) In the event that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
- (i) inform Natural Resources Wales,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) in the event of a breach of any permit condition the operator must immediately—
- (i) inform Natural Resources Wales, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) in the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 (a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where Natural Resources Wales has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform Natural Resources Wales when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.

4.3.4 Natural Resources Wales shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) Natural Resources Wales shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.6 Natural Resources Wales shall be given at least 14 days notice before implementation of any part of the site closure plan.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "without delay", in which case it may be provided by telephone.

Schedule 1 - Operations

Table S1.1 activities

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A1	S5.6 A(1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in 5.1 (incineration for disposal) or 5.3 (disposal or recovery of hazardous waste)	D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced) R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	<p>Hazardous waste types as specified in Table S2.1.</p> <p>Maximum of 150 tonnes stored in accordance with the EMS.</p> <p>Maximum of 5 tonnes of waste refrigerant oil to be stored at any one time.</p> <p>Hazardous waste must be stored in dedicated, labelled appropriate containers.</p> <p>Waste refrigerant oil can be bulked up prior to removal from site.</p> <p>Buildings, covered areas or containers must meet the following requirements:</p> <ol style="list-style-type: none"> 1. Rain and uncontaminated surface water must be kept separate from contaminated water and other liquids; 2. Containers must be stored on an impermeable surface with sealed drainage.
A2	Reclaim Plant	Processing of one tonne drums containing waste refrigerant	Includes removal of oil, water and non-condensable gases.

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Table S1.1 activities

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
	Description of activities for waste operations		Limits of activities
A3	<p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents</p> <p>D9: Physio-chemical treatment not specified elsewhere in this Annex which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12 (e.g. evaporation, drying, calcination, etc.)</p> <p>D14: Repackaging prior to submission to any of the operations numbered D1 to D13</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)</p>		<p>Treatment operations shall be limited to:</p> <ul style="list-style-type: none"> • Degassing treatment including: • distillation • separation • compressing • depressurising • drying <p>of hazardous waste for recovery.</p> <p>Treatment of waste shall be carried out with a building on an impermeable surface with sealed drainage.</p> <p>Waste types as specified in Table 2.1</p>

Table S1.2 Operating techniques

Description	Parts	Date Received
How to comply with your environmental permit	All	n/a
Guidance on Best Available Treatment Recovery and Recycling Techniques (BATRRT) and treatment of Waste Electrical and Electronic Equipment (WEEE)	All	n/a
Working plan	All	31/05/12
Harp International Limited Environmental Permit Management System, Issue 3, June 2015	All	04/06/15
Application	Parts C2, C3	11/05/16
Harp International Limited Environmental Permit Management System, Issue 6, May 2016	All	11/05/16
Document No 3: 5a Supporting information	All	11/05/16

Schedule 2 - Waste types, raw materials and fuels

Table S2.1 Permitted waste types and quantities for hazardous waste storage and treatment of refrigerant gas

Maximum quantity The total quantity of waste accepted at the site shall be less than 2,600 tonnes a year.

Waste code	Description
13	OIL WASTES AND WASTES OF LIQUID FUELS (except edible oils, and those in chapters 05, 12 and 19)
13 02	waste engine, gear and lubricating oils
13 02 05*	mineral-based non chlorinated engine, gear and lubricating oils
13 02 08*	other engine, gear and lubricating oils
14	WASTE ORGANIC SOLVENTS, REFRIGERANTS AND PROPELLANTS (except 07 and 08)
14 06	waste organic solvents, refrigerants and foam/aerosol propellants
14 06 01*	chlorofluorocarbons, HCFC, HFC
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 05	gases in pressure containers and discarded chemicals
16 05 04*	gases in pressure containers (including halons) containing dangerous substances
16 05 05	gases in pressure containers other than those mentioned in 16 05 04
16 05 08*	discarded organic chemicals consisting of or containing dangerous substances
16 05 09	discarded chemicals other than those mentioned in 16 05 06, 16 05 07 or 16 05 08

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Schedule 3 – Emissions and monitoring

There are no emission limits or associated monitoring requirements.

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Schedule 4 – Reporting

There is no reporting under this schedule.

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Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any activity that gives rise to an incident or accident which significantly affects or may significantly affect the environment	
To be notified Immediately	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a permit condition	
To be notified immediately	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) In the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment:

To be notified immediately	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 - Interpretation

“accident” means an accident that may result in pollution.

“Annex I” means Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Annex II” means Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“best available treatment, recovery and recycling techniques” shall have the meaning given to it in the document published jointly by the Department for Environment, Food and Rural Affairs, the Welsh Assembly Government and the Scottish Executive on 27th November 2006, entitled “Guidance on Best Available Treatment, Recovery and Recycling Techniques (BATRRT) and Treatment of Waste Electrical and Electronic Equipment (WEEE);

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“controlled substances” means chlorofluorocarbons, other fully halogenated chlorofluorocarbons, halons, carbon tetrachloride, 1, 1, 1-trichloroethane, methyl bromide, hydrobromofluorocarbons and hydrochlorofluorocarbons listed in Annex I of Regulation (EC) No 2037/2000 of the European Parliament and of the Council of 29 June 2000 on substances that deplete the ozone layer, including their isomers, whether alone or in a mixture, and whether they are virgin, recovered, recycled or reclaimed. This definition shall not cover any controlled substance which is in a manufactured product other than a container used for the transportation or storage of that substance, or insignificant quantities of any controlled substance, originating from inadvertent or coincidental production during a manufacturing process, from unreacted feedstock, or from use as a processing agent which is present in chemical substances as trace impurities, or that is emitted during product manufacture or handling.

“disposal” means any of the operations provided for in Annex IIA to Directive 2006/12/EC of the European Parliament and of the Council of 5 April 2006 on Waste.

“D” means a disposal operation provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit..

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 No.894, the Hazardous Waste (Wales) Regulations 2005 No. 1806 (W.138), the List of Wastes (England) Regulations 2005 No.895 and the List of Wastes (Wales) Regulations 2005 No. 1820 (W.148).

“hazardous property” has the meaning in Annex III of the Waste Framework Directive

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

“ozone-depleting substances” “ODS” means “controlled substances” contained in refrigeration, air-conditioning and heat pump equipment, equipment containing solvents, fire protection systems and fire extinguishers.

“Pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex IIB to Directive 2006/12/EC of the European Parliament and of the Council of 5 April 2006 on Waste.

“R” means a recovery operation provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

“WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste

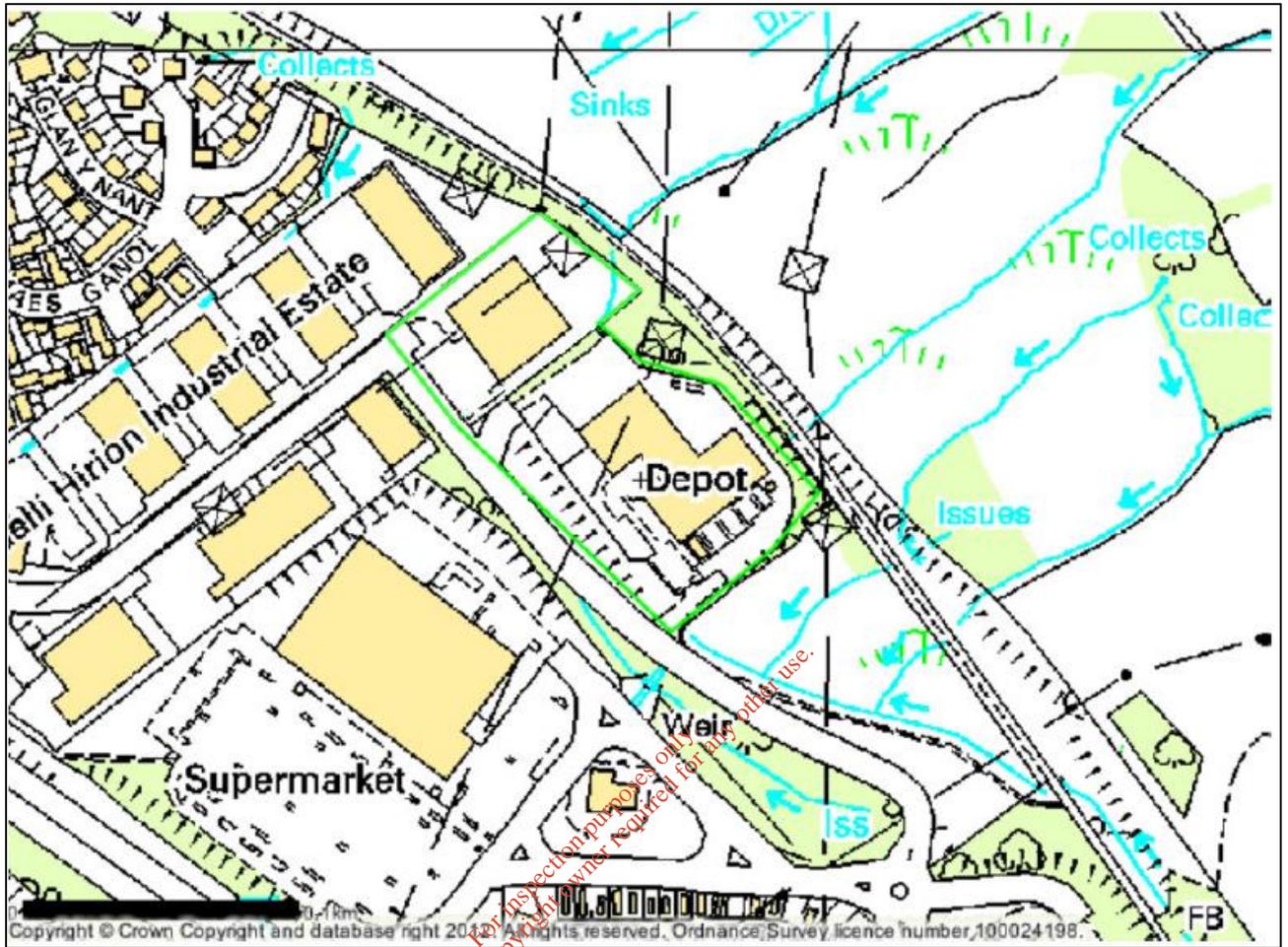
“WEEE” means waste electrical and electronic equipment.

“WEEE Directive” means Directive 2002/96/EC of the European Parliament and of the Council of 27th January 2003 on waste electrical and electronic equipment (WEEE) as amended by Directive 2003/108/EC of the European Parliament and of the Council of 8th December 2003 on waste electrical and electronic equipment (WEEE).

“year” means calendar year ending 31 December.

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Schedule 7 - Site plan



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END OF PERMIT

Appendix B – Waste Licence Application – Table E.1(iv) (updated 20/02/18)

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TABLE E.1(iv): EMISSIONS TO ATMOSPHERE - Minor /Fugitive

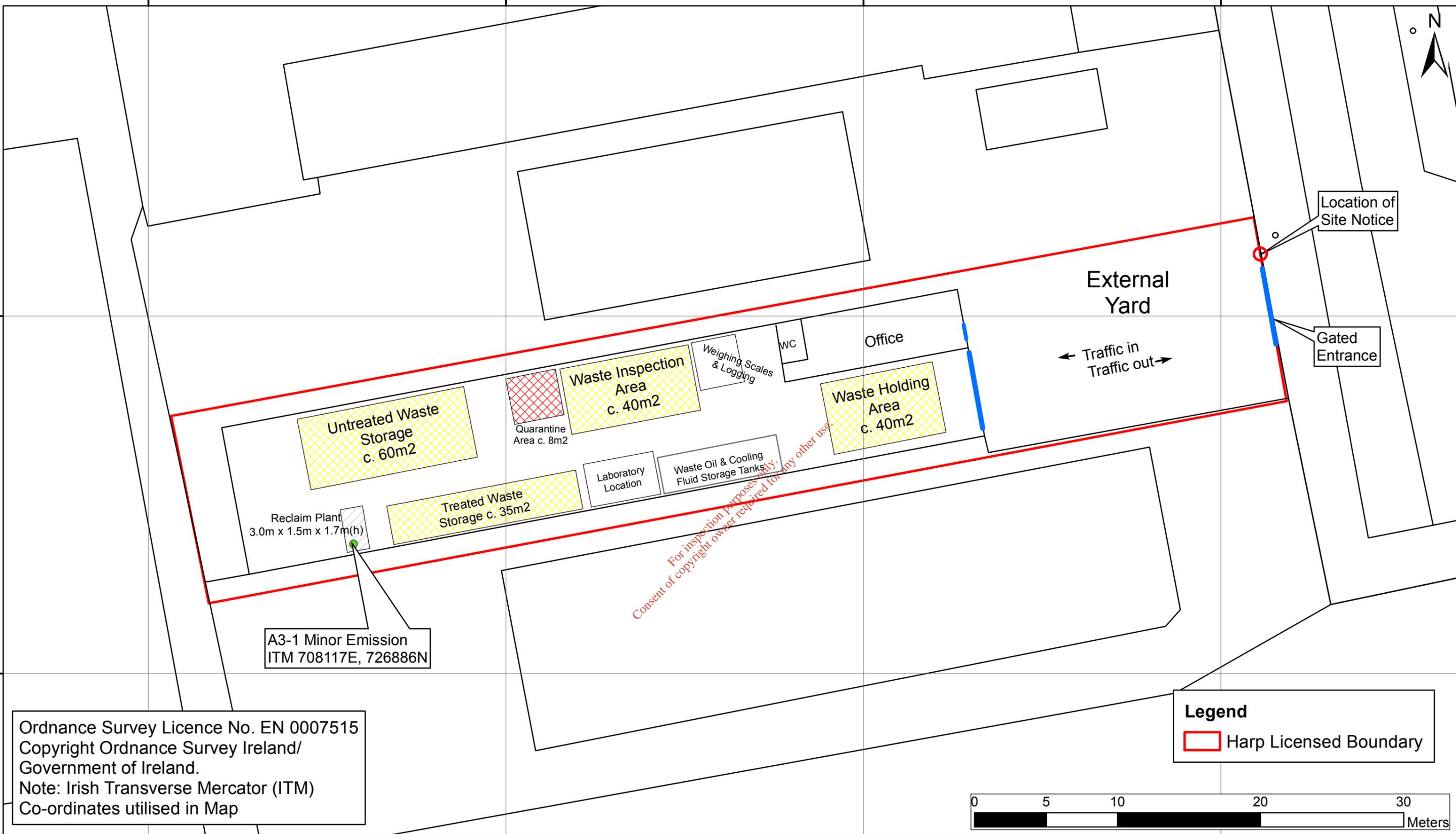
Emission point Reference Numbers	Description	Emission details ¹				Abatement system employed
		material	mg/Nm ³⁽²⁾	kg/h.	kg/year	
A3-1	Vented air (oxygen and nitrogen)	-	-	-	-	No abatement required.

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- 1 The maximum emission should be stated for each material emitted, the concentration should be based on the maximum 30 minute mean.
- 2 Concentrations should be based on Normal conditions of temperature and pressure, (i.e. 0°C/101.3kPa). Wet/dry should be clearly stated. Include reference oxygen conditions for combustion sources.

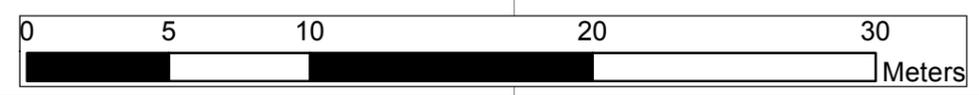
Appendix C – Site Layout Plan (updated 20/02/18)

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Ordnance Survey Licence No. EN 0007515
 Copyright Ordnance Survey Ireland/
 Government of Ireland.
 Note: Irish Transverse Mercator (ITM)
 Co-ordinates utilised in Map

Legend
 [Red Outline] Harp Licensed Boundary



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 Fax: + 353 1 847 4257

CLIENT:
Harp Refrigerants Ltd

PROJECT:
**Waste Licence
 Application**

DRAWING TITLE:
Site Layout Plan

REVISION DESCRIPTION

DRAWN	CHECKED	APPROVED	APPD DATE
R.H.	E.N.	E.N	21/02/2018
		No. of Shts	SIZE □ SCALE
		1	A3 1:250
DRAWING NUMBER			SHEET REV
Figure B6.1			2

Harp Refrigerants Limited

Pollution Prevention and Control

Plan

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Harp Refrigerants Limited
Unit 2, Whitestown Industrial Estate, Tallaght, Dublin 24

Registered in Ireland: Registration No. 532851

1. Purpose

This plan has been prepared to identify the potential pollution risks at the facility and to identify the measures which are in place to prevent pollution occurring.

2. Environmental Risks

The environmental risks identified for the planned activity at the facility are detailed in the Environmental Liabilities Risk Assessment (ELRA) for the facility (Document Ref. RH/14/8133WMR02b) which was prepared in accordance with the EPA publications entitled 'Guidance on Assessing and Costing Environmental Liabilities' (2014) and 'Guidance on Financial Provision' (2015).

The environmental risks identified and their risk score can be summarised as follows:

Risk ID	Location	Potential Risk	Risk Score
1	Warehouse	Refrigerant gas leak	2
2	Warehouse	Fire caused by electrical fault	3
3	Within Site Boundary	Diesel leak from delivery/collection vehicle	1
4	Within Site Boundary	Diesel leak from forklift	1
5	Warehouse	Hazardous liquid spill from oil or cooling fluid storage tank	2
6	Warehouse	Waste oil leak from reclamation plant	1

All risks identified have a low or very low likelihood of occurrence and are trivial (risk score 1), minor (risk score 2) or moderate (risk score 3) (as defined by the ELRA Guidance Document). All risks are categorised in the green zone (ELRA Insert 4.5) which indicates the need for continuing awareness and monitoring on a regular basis. The output of the risk treatment process is the development of a statement of measures to be taken to minimise the environmental risk of the activity. The statement of measures is presented in the table below. Ongoing maintenance and inspection procedures have been outlined and highlighted to ensure that the likelihood of occurrence of the identified risks and the potential environmental consequences are kept at a very low rating.

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Risk ID	Potential Hazard	Mitigation Measures to be Taken	Outcome	Action	Completion Date	Responsible Person
2	Fire caused by electrical fault	Programme for testing of electrical services/appliances (i.e. Static/PAT testing) to be prepared	Further reduce likelihood of electrical fault from portable equipment	A programme for Static/PAT testing will be prepared	Annually	Facility Manager
1	Refrigerant gas leak	Procedure already developed for acceptance of waste refrigerant cylinders and drums which specifies an inspection requirement (<i>Work Instruction No. 001</i>). Management to reinforce importance of inspections at regular meetings	Further reduce the likelihood of non-conforming cylinders or drums being received at the site and potentially leading to a gas leak.	Inspection procedure (<i>Work Instruction No. 001</i>) reminder to be regularly issued to any employees working at the facility.	Ongoing	Facility Manager
5	Hazardous liquid spill from oil or cooling fluid storage tanks	Fuel storage tanks brought to site for waste oil and cooling fluid storage will be in good condition and regularly inspected to ensure the tank and bund integrity is not compromised.	Reduced risk of leak or rupture of storage tanks	Tank integrity to be inspected as part of regular site inspections.	Ongoing	Facility Manager
3	Diesel leak from delivery/collection vehicle	A Pollution Prevention & Control Plan will be prepared which specifies measures in place to mitigate risk of diesel leak migrating to the	Further reduces the likelihood of diesel leak migrating to surface	Provision of copy of the Pollution Prevention & Control Plan in the office and providing	Ongoing	Facility Manager

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Risk ID	Potential Hazard	Mitigation Measures to be Taken	Outcome	Action	Completion Date	Responsible Person
		surface water drains	water drains	spill kits close to delivery areas.		
4	Diesel leak from forklift	A Pollution Prevention & Control Plan will be prepared which specifies measures in place to mitigate risk of diesel leak migrating to the surface water drains.	Further reduces the likelihood of diesel leak migrating to surface water drains	Provision of copy of the Pollution Prevention & Control Plan in the office and providing spill kits close to delivery areas.	Ongoing	Facility Manager
6	Waste oil leak from reclamation plant	A Pollution Prevention & Control Plan will be prepared which specifies measures in place to mitigate risk of diesel leak migrating to the surface water drains.	Further reduces the likelihood of diesel leak migrating to surface water drains	Provision of copy of the Pollution Prevention & Control Plan in the office and providing spill kits close to delivery areas.	Ongoing	Facility Manager

3. Pollution Prevention and Control Plan

This Pollution Prevention and Control Plan is in place to address any of the potential pollution incidents that could occur at the facility as summarised in Section 2 of this Plan and detailed in the ELRA for the facility (Document Ref. RH/14/8133WMR02b).

3.1 Fire caused by electrical fault

The only plausible fire scenario anticipated at the facility is from an electrical fault. The likelihood of a fire occurring was determined in the ELRA to be very low and it was identified as having a moderate consequence.

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The potential environmental effects identified in the ELRA in the unlikely event of a fire from an electrical fault are release of smoke to atmosphere, generation of firewater and disposal of burnt waste material.

There are lights and basic electrical wiring at a high level throughout the warehouse and there is IT equipment and kitchen appliances in the office. The office area is constructed of concrete blocks with timber joists in the ceiling. Outside of the office area there is very little combustible material in the warehouse.

The reclaim plant runs on three phase electrical power and is fitted with emergency stops and trip switches in the event of an electrical fault. The plant is constructed from steel which is not highly combustible. The refrigerant gases are non-flammable and are fire retardants. The cylinders/drums for holding the gas are maintained in good condition.

The Pollution Prevention and Control measures that are in place include the following:

1. A programme for testing of electrical services/appliances (i.e. Static / PAT testing) is currently being prepared.
2. Fire extinguishers are strategically positioned within the warehouse.
3. The fire alarm is monitored externally.
4. No hazardous materials are stored in the office area so resultant smoke, firewater and ash will not contain significant hazardous substances.
5. In the unlikely event of a fire, firewater will be diverted to the storm-water drains at the site by using absorbent material / mats from the spill kit kept at the site. Firewater discharged from a fire at this facility would have a short-term moderate impact on the quality of the receiving storm water drainage system.
6. If possible, depending on the extent of the fire and firewater / extinguishers used, firewater will be contained and fully absorbed by using saw dust or other suitable absorbent material.
7. Fire damaged solid waste material including materials used for firewater absorption will be removed from site by a suitably permitted waste contractor for recovery or disposal at an authorised facility.

3.2 Leak of refrigerant gas from storage cylinder or drum

The potential environmental effects identified in the ELRA from a leak of refrigerant gas from storage cylinder or drum is the release of gas which may have ozone layer depleting effects or global warming potential. The likelihood of this occurring was determined in the ELRA to be low with a trivial consequence (i.e. no impact or negligible change to the environment). The potential volume of gas which could be released in an incident would be minute in terms of ozone layer depletion.

The Pollution Prevention and Control measures that are in place include the following:

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1. The gas cylinders and drums owned by Harp Refrigerants are maintained in good condition prior to distribution from their UK facility.
2. All cylinders and drums accepted at the site will be inspected to ensure they are in good condition in accordance with *Work Instruction No. 001*. Management to reinforce importance of inspections at regular meetings. To further reduce the likelihood of non-conforming cylinders or drums being received at the site and potentially leading to a gas leak, a *Work Instruction No. 001* reminder will be regularly issued to any employees working at the facility.
3. The reclaim plant is operated at negative pressure so that there is no release to atmosphere from connection and disconnection of hosing.

3.3 Diesel leak from delivery/collection vehicle

The potential environmental effects identified in the ELRA from a diesel leak from delivery or collection vehicle at the site is the potential for the leaked diesel to reach storm-water drains on site and be carried to receiving surface water body. The likelihood of this occurring was determined in the ELRA to be very low with a trivial consequence (i.e. no impact or negligible change to the environment).

The entire site is covered in concrete hardstanding so any potential release would be prevented from reaching soil or groundwater.

Major tank rupture and large volume release at the site is not considered plausible so potential release would be small in volume and could easily be contained by a spill kit which would prevent the diesel from reaching the storm-water drain. The closest storm-water drain is likely to be at least 5m from parked location of delivery / collection truck at any time and would allow enough time for absorbent booms and drip tray to be put in place.

In the unlikely event of leak or release, it is likely to be very small in volume and would be significantly diluted by other contributions to the municipal storm-water network prior to release to surface water.

The Pollution Prevention and Control measures that are in place include the following:

1. A spill kit and drip tray will be stored on site.
2. All personnel will be trained in the use of the spill kit and drip tray.
3. In the event of a small release from a delivery / collection vehicle, absorbent material/mats and drip tray will put in place to contain the release.
4. The absorbent materials / mats and any diesel collected in the drip tray will be appropriately contained in suitable receptacles and will be removed from site by a suitably permitted waste contractor for recovery or disposal at an authorised facility.
5. A reminder of this Pollution Prevention and Control Plan will be regularly issued to any employees working at the facility.

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3.4 Diesel leak from forklift

The potential environmental effects identified in the ELRA from a diesel leak from forklift used on site for loading and unloading is the potential for the leaked diesel to reach storm-water drains on site and be carried to receiving surface water body. The likelihood of this occurring was determined in the ELRA to be very low with a trivial consequence (i.e. no impact or negligible change to the environment).

The entire site area is covered in hardstanding so there is no direct pathway from the surface to the soil or groundwater. Storage of diesel and refuelling of the forklift will be carried out internally, away from the surface water drainage gulleys on site so there is minimal risk of contamination of the municipal network from a diesel spill.

The Pollution Prevention and Control measures that are in place include the following:

1. The diesel used for refuelling the forklift is stored in two 20 litre Jerry Cans within the warehouse on a suitably sized spill pallet. The spill pallet will be inspected regularly and will be retested in accordance with the manufacturers recommended frequency.
2. A spill tray will be used for refuelling. The spill tray are located adjacent to the spill pallet at all times.
3. A spill kit is stored adjacent to the spill pallet.
4. Refuelling of the forklift will only take place in this area.
5. All personnel will be trained in the use of the spill kit and drip tray for refuelling.
6. In the unlikely event of a diesel leak from the forklift, absorbent material / mats and a drip tray will put in place to contain the release.
7. The absorbent material / mats and any diesel collected in the drip tray will be appropriately contained in suitable receptacles and will be removed from site by a suitably permitted waste contractor for recovery or disposal at an authorised facility.
8. A reminder of this Pollution Prevention and Control Plan will be regularly issued to any employees working at the facility.

3.5 Hazardous liquid spill from oil or cooling fluid storage tanks

The potential environmental effects identified in the ELRA from a leak from waste liquid storage tanks is the potential for the leaked liquids to reach storm-water drains on site and be carried to receiving surface water body. The likelihood of this occurring was determined in the ELRA to be very low with a minor consequence (i.e. negligible change to the environment).

The entire site area is covered in hardstanding so there is no direct pathway from the surface to the soil or groundwater. Tanks for storage waste oil and cooling fluid will be internally away from surface water drainage gulleys so there is minimal risk of contamination of the sewer network from a spill or leak. The maximum quantity of material that will be stored on site will be 4,000 litres but for the majority of time, the actual quantity stored will be much less. Deliveries of waste oil and cooling fluid

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will be in small drums (typically 205 litre drums) so any accident during transfer or decanting into the storage tanks would be small in quantity.

The Pollution Prevention and Control measures that are in place include the following:

1. The waste oil and cooling fluid storage tanks will be bunded and located internally in the warehouse. The tanks will be inspected regularly and maintained according to the manufacturers recommendations.
2. A spill kit will be stored adjacent to the tanks.
3. Decanting into the tanks will be from small drums and collection of the waste oil will most likely be carried out using a suction hose.
4. All personnel will be trained in the use of the spill kit and procedure for decanting.
5. In the unlikely event of spill or leak, absorbent material / mats and a drip tray will put in place to contain the release.
6. The absorbent material / mats and any fluids collected in drip trays will be appropriately contained in suitable receptacles and will be removed from site by a suitably permitted waste contractor for recovery or disposal at an authorised facility.
7. A reminder of this Pollution Prevention and Control Plan will be regularly issued to any employees working at the facility.

3.6 Waste oil leak from reclaim plant

The potential environmental effects identified in the ELRA from an oil leak from the reclaim plant is the potential for the leaked liquids to reach storm-water drains on site and be carried to receiving surface water body. The likelihood of this occurring was determined in the ELRA to be very low with a trivial consequence (i.e. no impact or negligible change to the environment).

The entire site area is covered in hardstanding so there is no direct pathway from the surface to the soil or groundwater. The reclaim plant will be located at the rear of the warehouse, a significant distance from any surface water drainage gulleys so there is minimal risk of contamination of the sewer network from a spill or leak. Any leak of oil from the equipment would be easily identifiable and would be small in volume.

The Pollution Prevention and Control measures that are in place include the following:

1. There is a waste oil sump in the reclaim plant which will retain the oil within the equipment during the reclamation process. When this sump is reaching full, the sump can be emptied and the contents transferred to the waste oil storage tank on site.
2. The reclaim plant will undergo regular scheduled maintenance and the waste oil sump will be inspected as part of the maintenance process.
3. A spill tray will be available for use where required.

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4. A spill kit will be stored adjacent to the fuel and waste liquids storage tanks and available for use if required.
5. All personnel will be trained in the appropriate process for draining oil from the equipment.
6. In the unlikely event of a leak from the equipment, absorbent material / mats and a drip tray will put in place to contain the release.
7. The absorbent material / mats and any oil collected in the drip tray will be appropriately contained in suitable receptacles and will be removed from site by a suitably permitted waste contractor for recovery or disposal at an authorised facility.
8. A reminder of this Pollution Prevention and Control Plan will be regularly issued to any employees working at the facility.

In the event that a pollution incident does occur, the steps that will be taken to respond to the pollution incident are detailed in the Pollution Incident Response Plan.

4. Recording

In the event that a pollution incident does occur, a unique number will be allocated by Harp to the incident and full details of the incident be documented in a register on Harp's intranet.

5. Notification to EPA

The Agency will be notified of any significant pollution incident at the site in accordance with the requirements of the Waste Licence.

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