

Register No. – W0270-02

**FURTHER INFORMATION SUBMISSION TO SUPPORT INDUSTRIAL EMISSIONS
LICENCE APPLICATION (REG. No. W0270-02)**

Ref: RFI Submission 1

Submission By: Milltown Composting Systems Ltd.,
Milltownmore,
Fethard,
Co. Tipperary.

Submission To: Environmental Protection Agency.
Office of Climate Licensing & Resource Use,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford



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

DOCUMENT CONTROL SHEET

Applicant	Milltown Composting Systems Ltd.
Project	Further Information Submission
Document Title	Further Information Submission to Support Industrial Emissions Licence Application (Reg. No. W0270-02)

Revision	Status	Author	Reviewed by	Approved By	Issue Date
00	Draft 1	BS	JR	JR	26/07/2018
01	Final	BS	JR	JR	01/08/2018

INTRODUCTION

Milltown Composting Systems Ltd. (Milltown), Milltownmore, Frethard, Co. Tipperary submitted an application for an Industrial Emissions Licence (IED) to the Environmental Protection Agency (Agency) in December, 2017. The Agency responded to Milltown's application for an IED licence on May 29th, 2018 requesting additional information in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licencing) Regulations 2013.

The request from the Agency included a schedule of queries that required clarification and for clarity the headings and numbering used in the request letter from the Agency will be used in this response document. Each query will be included in italics and the response provided below each query.

1. As required under Regulation 9(2)(h),

(a) Tabulate all of the relevant BAT conclusions in Section 5.2 'BAT for Specific types of waste treatments' of the BREF document for the Waste Treatments Industries

(b) In the submitted BAT Assessment document, the BAT Guidance Note for Disposal or Recycling of Animal Carcasses & Animal Waste Sector is listed as applicable. Tabulate all of the relevant BAT Conclusions from this document and clarify the applicability to the installation.

(c) For both (a) and (b) above, and where not already stated in the application, the following details should also be included in your tables:

- For all applicable conclusions on BAT, state if it is proposed to be put in place and the timeline for implementation. Details of any proposals must be provided.***
- Where you do not propose to meet the requirements of a particular BAT conclusion, provide reasons and a justification.***

The revised BAT tables are provided in Attachment 1.

2. As required under Regulation 9(2)(g), clarify the subsequent pathway of any water leaving the installation from the current and proposed Emission to Water Points SW1 and SW1a, and state whether the water discharges to ground or surface water. Submit an accompanying map illustrating the subsequent pathway.

A drawing showing the location of the current (SW1) and proposed (SW1a) surface water sampling location and the existing and proposed surface water pathway is provided in Attachment 2. The water is directed to a surface water drain that flows in a southwest direction from the site where the majority of water would discharge to the Moyle River approximately 1.8km away. However, there may also be some loss of water to ground through seepage through the base of the surface water channel.

3. The application states that 200 m³ of gas and 1,500 litres of diesel will be used at the installation per annum. Clarify the purpose and storage arrangement of these materials and clarify the type of gas to be utilised [Regulation 9(2)(g)].

The equipment used on site for moving organic material within the composting process bays, moving and shaping maturing material and loading processed material on trucks for transfer off site use Agri diesel. The diesel is stored in a double skinned tank located in a purpose built bund at the waste reception building.

The description provided in Table 4.6-1 of the application referred to Gas Oil (Agri-diesel) which is the fuel used on site for the operation of site equipment and not natural gas or LPG for heating. The inclusion of gas oil in Table 4.6-1 may have confused the Agency and it may not have been the correct location to include the estimated volume of diesel usage. There is no Gas used on site, the only fuel used on the Milltown site is diesel for the site equipment. The volume of 1,500 litres in Table 4.6-2 refers to the volume of diesel stored on site at any one time and the volume of 200m³ in the Table in 4.6-1 refers to the estimated volume of diesel used per year.

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

An updated non-technical summary including all amendments and changes related to the above Requests for Further Information from the Agency related to Licence Application Reg No. W0270-02 are included in Attachment 3.

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

ATTACHMENT 1

BAT Conclusions

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

BAT DOCUMENT REVIEW FOR SELECTION OF PROCESSES APPLICABLE TO MSW COMPOST TREATMENT

Title of Document
BAT Guidance Note for Ferrous Metal Processing and the Pressing, Drawing and Stamping of Large Castings where the Production Area exceeds 500 sq m - Aug 2012 - Not Applicable as no metal processing will be completed on the site.
BAT Guidance Note for Ferrous Metal Foundries - Aug 2012 - Not Applicable as the facility is not a Ferrous Metal Foundries
BAT Guidance Note - Waste Sector (Landfill) - Dec 2011 - Applicable as a fraction of the treated compost will be sent to landfill
BAT Guidance Note - Waste Sector (Transfer & Materials Recovery) - Dec 2011 - Applicable as facility will be processing and storing food waste, animal waste for composting
BAT Guidance Note for the Manufacture of Integrated Circuits - Not Applicable as the facilities process consist of composting
BAT Guidance Note for the Initial Melting and Production of Iron & Steel Sector - Not Applicable as the facility is not an Iron or Steel Melting and Production facility
BAT Guidance Note for the Production of Paper Pulp, Paper & Board - Not Applicable as the facility is not a production facility for paper or pulp
BAT Guidance Note for Brewing, Malting & Distilling Sector - Not Applicable as the facility is not a production facility brewing, malting & distilling
BAT Guidance Note for Disposal or Recycling of Animal Carcasses & Animal Waste Sector - Applicable as the facility may be processing animal waste/slurry
BAT Guidance Note for the Animal Slaughtering Sector - Not Applicable as the facility will not be operating in this sector
BAT Guidance Note for the Cement & Lime Sector - Not Applicable as the facility will not be operating in this sector
BAT Guidance Note for the Ceramic & Diamond Sector - Not Applicable as the facility will not be operating in this sector
BAT Guidance Note for the Dairy Sector - Not Applicable as the facility will not be operating in this sector
BAT Guidance Note for the Energy (LCP) Sector - Not Applicable as the facility will not be operating a large combustion plant
BAT Guidance Note for the Fish Meal & Fish Oil Sector - Not Applicable as the facility will not be operating in this sector
BAT Guidance Note for the General Inorganic & Alumina Sector - Not Applicable as the facility will not be operating in this sector
BAT Guidance Note for the Glass Sector including Glass Fibre - Not Applicable as the facility will not be melting mineral fibres or manufacturing glass.
BAT Guidance Note for the Metals & Plastics Sector - Not Applicable as the facility will not be operating in this sector
BAT Guidance Note for the Non Ferrous Metals & Galvanising Sector - Not Applicable as the facility will not be operating in this sector

<p>BAT Guidance Note for the Oil & Gas Refining Sector - Not Applicable as the facility will not be operating in the oil and gas sector</p>
<p>BAT Guidance Note for the Organic Chemical Sector - Not Applicable as the facility will not be operating in the chemical sector</p>
<p>BAT Guidance Note for the Textiles Processing Sector - Not Applicable as the facility will not be operating in the textiles processing sector</p>
<p>BAT Guidance Note for the Use of Solvents - Not Applicable as the facility will not be using solvents.</p>
<p>BAT Guidance Note for the Vegetable & Animal Raw Materials Sector - Not Applicable as the facility will not be operating in the vegetable and animal raw materials sector</p>
<p>BAT Guidance Note Pesticides, Pharmaceuticals & Speciality Organic Chemicals Sector - Not Applicable as the facility will not be operating in the pesticides, pharmaceuticals and speciality organic chemicals sector</p>
<p>BATNEEC Guidance Note - Board Manufacturing Sector - 1996 - Not Applicable as the facility will not be manufacturing board</p>
<p>BATNEEC Guidance Note - Electroplating Operations - Oct 1996 - Not Applicable as the facility will not be operating in the electroplating operations</p>
<p>BATNEEC Guidance Note - Extraction of Minerals - Nov 1997 - Not Applicable as the facility will not be extracting minerals</p>
<p>BATNEEC Guidance Note - Manufacture of Sugar - Sept 1996 - Not Applicable as the facility will not be operating in the sugar sector</p>
<p>BATNEEC Guidance Note - Manufacture of Synthetic Fibres - Nov 1997 - Not Applicable as the facility will not be manufacturing synthetic fibres</p>
<p>BATNEEC Guidance Note - Manufacture or Use of Coating Materials - Nov 1997 - Not Applicable as the facility will not be manufacturing or use of coating materials</p>
<p>BATNEEC Guidance Note - Pig Production Sector - Feb 1998 - Not Applicable as the facility will not be in the pig production sector</p>
<p>BATNEEC Guidance Note - Poultry Production Sector - Feb 1998 - Not Applicable as the facility will not be in the poultry production sector</p>
<p>BATNEEC Guidance Note - Waste Sector (IPPC) - May 1996 - Not Applicable as the facility will not be incinerating waste or using heat to manufacture a fuel from waste. The facility will be used for the aerobic treatment of BMW by composting</p>
<p>BATNEEC Guidance Note - Wood Treatment and Preservation - Nov 1997 - Not Applicable as the facility will not treating or preserving wood</p>
<p>Draft BATNEEC Guidance Note - Asbestos Sector - 03/06/96 - Not Applicable as the facility will not be manufacturing or processing asbestos based products.</p>
<p>Draft BATNEEC Guidance Note - Crude Petroleum Handling & Storage - Not Applicable as the facility will not be handling or storing crude petroleum</p>
<p>Draft BATNEEC Guidance Note - Fellmongering & Tanning - 02/04/96 - Not Applicable as the facility will not be fellmongering or tanning leather</p>
<p>Draft BATNEEC Guidance Note - Forges - 15/05/96 - Not Applicable as the facility will not be operating a forge</p>

Draft BATNEEC Guidance Note - Manufacture of Vegetable & Animal Oils and Fats - 05/06/96 - Not Applicable as the facility will not be manufacturing of vegetable & animal oils and fats
Draft BATNEEC Guidance Note - Roasting, Sintering or Calcining - 15/05/96 - Not Applicable as the facility will not be roasting, sintering or calcining of metallic ores in plants
Draft BATNEEC Note - Glass Production - 37/06/96 - Not Applicable as the facility will not be producing glass
Draft BATNEEC Guidance Note - Extraction of Peat - 14/05/96 - Not Applicable as the facility will not be extracting peat
Draft BATNEEC Guidance Note - Organo Tin - 13/10/96 - Not Applicable as the facility will not be coating tin
BATNEEC Note - Chemical Sector - May 1996 - Not Applicable as the facility will not be manufacturing, formulating or storing the listed chemicals at the facility.
Draft BATNEEC Guidance Note - Asbestos, Glass, Mineral Fibre Sector - 20/05/96 - Not Applicable as the facility will not be manufacturing or processing asbestos, asbestos based products or glass fibres
Draft BATNEEC Guidance Note - Carbonation, etc of Coal, etc - 15/05/96 - Not Applicable as the facility will not be carrying out the pyrolysis, carbonisation, gasification, liquefaction, dry distillation, partial oxidation or heat treatment of coal, lignite, oil or bituminous shale, other carbonaceous materials or mixtures of any kind
Draft BATNEEC Guidance Note - Asbestos, Glass & Mineral Fibre Sector - 30/04/96 - Not Applicable as the facility will not be manufacturing or processing asbestos, asbestos based products or glass fibres.
Draft BATNEEC Guidance Note - Manufacture Glass Fibre or Mineral Fibre - 03/07/96 - Not Applicable as the facility will not be manufacturing glass or mineral fibres
Draft BATNEEC Guidance Note - Ferrous Metals - 14/05/96 - Not Applicable as the facility will not be producing, recovering, processing or using ferrous metals in foundries.
BREF on the production of Cement, Lime and Magnesium Oxide (01.13) - Not applicable as the facility will not be producing cement, lime or magnesium oxide
BAT Conclusion on the Production of Cement, Lime, and Magnesium Oxide (04.13) - Not applicable as the facility will not be producing cement, lime or magnesium oxide
BREF for the Ceramic Manufacturing Industry (08.07) - Not applicable as the facility will not be manufacturing ceramics
REF in the Chlor-Alkali Manufacturing Industry (12.01) - Not applicable as the facility will not be manufacturing chlor-alkali
BREF in Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector (02.03) - Not applicable as the facility will not be operating in this sector
BREF to Industrial Cooling Systems (12.01) - Not applicable as the facility will not require a cooling system as no process will be taking place.
BREF on Economic and Cross Media Effects (07.06) - Not applicable at the facility

BREF on Emissions from Storage (07.06)
BREF for Energy Efficiency (02.09)
BREF in the Ferrous Metals Processing (12.01) - Not applicable as metals will not be processed at the facility
BREF on the Food, Drink and Milk Processes Industries (08.06) - Not applicable as Food, Drink and Milk will not be manufactured at the facility
BREF on Intensive Rearing of Poultry & Pigs (07.03) - Not applicable as no poultry or pigs will be reared at the facility
BREF on the Production of Iron and Steel (01.13) - Not applicable as iron and steel will not be manufactured at the facility
BAT Conclusion on the Production of Iron and Steel (03.12) - Not applicable as iron and steel will not be manufactured at the facility
BREF for Large Combustion Plant - Not applicable as the facility will not be operating a large combustion plant and will only be used for the temporary storage of material.
BREF on Large Volume Inorganic Chemicals - Ammonia, Acids & Fertilisers (08.07) - Not applicable as Ammonia, Acids & Fertilisers will not be manufactured at the facility.
BREF on Large Volume Inorganic Chemicals - Solids & Other Industry (08.07) - Not applicable as chemicals will not be manufactured at the facility.
BREF in the Large Volume Organic Chemicals Industry (02.03) - Not applicable as chemicals will not be manufactured at the facility.
BREF on the Management of Tailings and Waste-rock in Mining Activities (01.09) - Not applicable as no mining activities are to take place at the site.
BREF for the Manufacture of Glass (01.13) - Not applicable as glass will not be manufactured at the facility.
BAT Conclusion on the Manufacture of Glass (03.12) - Not applicable as glass will not be manufactured at the facility.
BREF on the General Principles of Monitoring (07.03) - Not applicable as directed at regulators
BREF on Non Ferrous Metals Processes (12.01) - Not applicable as metal will not be manufactured at the facility
BREF in the Pulp and Paper Industry (12.01) - Not applicable as glass will not be manufactured at the facility
BAT Conclusion for the production pulp, paper and board (09.14) - Not applicable as pulp, paper and board will not be produced at the facility
BREF for Organic Fine Chemicals (08.06) - Not applicable as no organic fine chemicals will be on site
BREF for the Production of Polymers (08.07) - Not applicable as no polymer production will be taking place on site
BREF for Mineral Oil and Gas Refineries (02.03)

- Not applicable as there will be no oil or gas refining at the facility
BAT Conclusions for the Refining of mineral oil and gas (03.14) - Not applicable as there will be no oil or gas refining at the facility
BREF for the Slaughterhouses and Animal By-Products Industries (05.05) - Applicable as the facility will be accepting some animal by-products as waste.
BREF on the Production of Speciality Inorganic Chemicals (08.07) - Not applicable as the facility will not be producing any chemicals.
BREF in the Smitheries and Foundries Industry (05.05) - Not applicable as the facility will not contain a foundries or smitheries
BREF for the Surface Treatment of Metals and Plastics (08.06) - Not applicable as the facility will only be for the temporary storage of material and no treatment of materials will be taking place.
BREF on Surface Treatment using Organic Solvents (08.07) - Not applicable as the facility will not be treating substances, objects or products using organic solvents.
BREF for Waste Incineration (08.06) - Not applicable as the facility will not be incinerating waste.
BREF for the Waste Treatment Industries (08.06) - Applicable as the main processes on site are composting for the treatment of waste
BREF for the Tanning of Hides and Skins (01.13) - Not applicable as the facility will not be tanning hides and skins
BAT Conclusion on the Tanning of Hides and Skins (02.13) - Not applicable as the facility will not be tanning hides and skins
BREF for the Textiles Industry (07.03) - Not applicable as the facility will not be working with textiles at the facility

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

Table I.8 – Conclusions on BAT

Title of Document Waste Sector (Transfer & Materials Recovery) - Dec 2011			
BAT Ref.	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
4.1.2	Key Issues For Waste Transfer And Materials Recovery Facilities		
4.1.2.1	Site Location	Applicable	In Place – The facility buildings are located in an existing industrial building with no immediate domestic sensitive receptors. Facility is enclosed with no discharge of surface or process water from inside the facility.
4.1.2.2	Design Considerations	Applicable	In Place – Waste deposit and composting operations inside process building.
4.1.2.3	Decommissioning	Applicable	In Place - As part of the application a Residuals Management Plan was prepared for the site. Proposed – Scheduled updates on RMP to take changing conditions into account.
4.1.3	Environmental Management System (EMS)	Applicable	Proposed – EMS exists as part of existing waste licence.
4.1.4	Waste Acceptance	Applicable	In Place – Current SOPs in place for acceptance and rejection of wastes at the facility. Only wastes that are allowed under the current waste licence are allowed to be accepted on site.
4.1.4.1	Waste Acceptance Procedures	Applicable	In Place – Current SOPs in place for acceptance and rejection of wastes at the facility. .
4.1.5	Waste Dispatch	Applicable	In Place – SOPs for stored material and shipping
4.2 Risk to the Environment			
4.2.1 Potential Emissions to Air			
4.2.1.1	Inert Waste Transfer and Materials Recovery Facilities	Not Applicable	Not in Place: Mainly organic material accepted on site
4.2.1.2	Non-Hazardous Waste Transfer and Materials Recovery Facilities	Applicable	In Place - odour assessment at the facility is completed as part of the site waste licence conditions.
4.2.1.3	Hazardous Waste Transfer and Materials Recovery Facilities	Not applicable	Not in Place: No hazardous waste will be accepted or stored at the facility
4.2.1.4	Clinical Waste Transfer and Materials Recovery Facilities	Not applicable	Not in Place: No clinical waste will be accepted or stored at the facility
4.2.2 Potential Emissions to Water (including Groundwater) and Land			
4.2.2.1	Inert Waste Transfer and Materials Recovery Facilities	Not applicable	Not In Place – facility is a composting system inside process buildings.

BAT Ref.	BAT Statement	Applicability	State technique and whether it is in place or proposed for implementation
4.2.2.2	Non-Hazardous Waste Transfer and Materials Recovery Facilities	Applicable	In Place – There are no floor drains within the facility that discharge to either surface water or sewer. The impermeable concrete floor prevents discharge to land or groundwater. Leachate discharge from the composting process or the new reception building are directed to the leachate re-circulation system.
4.2.2.3	Hazardous Waste Transfer and Materials Recovery Facilities	Not applicable	Not in Place: No Hazardous Waste on site
4.2.2.4	Clinical Waste Transfer and Materials Recovery Facilities	Not applicable	Not in Place: No Clinical waste on site
4.3 Control Techniques			
4.3.1	Techniques for Prevention and Minimisation of Resource Consumption		
4.3.1.1	Use of Energy	Applicable	In Place – Energy usage is assessed on an annual basis as part of the waste licence conditions for the site.
4.3.1.2	Raw Materials	Not applicable	In Place - All material arriving at the site are non-hazardous waste and are controlled by the existing waste acceptance and handling SOPs.
4.3.2 Techniques for the Prevention and Minimisation of Emissions			
4.3.2.1	Minimisation of Emissions to Air	Applicable	In Place – A biofilter system is in place at the site to treat process air from the composting bays. The extension of the biofilter volume allows for potentially odorous air within the new reception building to be directed to the biofilter for treatment. Miltown will continue to monitor emissions in compliance with their waste licence to ensure that they meet regulatory limits or guidelines. Proposed - Planning Application submitted to install a second biofilter system to treat extracted air from Sheds 2 and 3.
4.3.2.2	Minimisation of Emissions to Water	Applicable	In Place - There are no discharges from inside the process building to surface water or sewer. Only discharge is to surface water from shed roofs and clean yard areas. The leachate re-circulation system controls all potentially impacted water emissions in the process buildings. Miltown will continue to monitor emissions in compliance with their waste licence to ensure that they meet regulatory limits or guidelines. Proposed – It is proposed to utilise the existing ICW on site to polish surface water runoff from the site prior to discharge from the site as part of an IED licence application.

BAT Ref.	BAT Statement	Applicability	State technique and whether it is in place or proposed for implementation
4.3.2.3	Fuel/Oil	Applicable	In Place - Fuel storage takes place in a tank located in a dedicated bunded area at the entrance to the new reception building. All re-fuelling will take place on hard standing at the building entrance to ensure that any spillages can be managed and cleaned immediately. An oil water separator unit exists on the surface water drainage system to remove any residual oil or fuel that may enter the surface water system.
4.3.3 Minimisation of Nuisances			
4.3.3.1	Litter/Housekeeping	Applicable	In Place - All material arriving on site is in closed trailers. Facility personnel complete daily checks at the access road to the facility and in the immediate environs to check for litter. Operations inside the shed are controlled and housekeeping is assessed daily.
4.3.3.2	Noise & Vibration	Applicable	In Place – The air extraction fan for shed 1 and the reception building is located on the southern side of the building with noise screened from the closest noise sensitive receptor. Noise monitoring completed as part of the existing licence indicated that the operations are not causing noise nuisance. Proposed: The proposed new biofilter for sheds 2 and 3 would have 2 air extraction fans (1x 55kw - 67dBA at 3m distance and 1 x 37kw -65dBA at 3m). The fans will be located to the north of the sheds and so it is proposed that an acoustic barrier will be installed for both of these fans to mitigate noise nuisance.
4.3.3.3	Vehicles	Applicable	Proposed – Assessment of fuel consumption and air emissions from on-site equipment and review of potential improvements.
4.3.3.4	Mud	Applicable	In Place - The site is mainly concreted and gravel surface with very little potential for mud on the site.
4.3.3.5	Vermin and Insects	Applicable	In Place – The facility has a vermin control contractor employed to install and regularly service vermin control measures on site.
4.3.3.6	Chemical Storage	Not Applicable	Not in Place: Only small volumes of cleaning chemicals held on site There will be no discharge to the environment of the chemicals
4.3.3.7	Infection Control	Not Applicable	Not in Place: There will be no clinical waste at the facility

BAT Ref.	BAT Statement	Applicability	State technique and whether it is in place or proposed for implementation
5	Best Available Techniques For Waste Sector: Waste Transfer And Materials Recovery		
5.1	<p>Primary Requirements: An EMS that incorporates the following features:</p> <ul style="list-style-type: none"> • Management and Reporting Structure. • Schedule of Environmental Objectives and Targets. • Annual Environmental Report (AER). • Environmental Management Programme (EMP). • Documentation System. • Corrective Action Procedures. • Awareness and Training Programme. • Communications Programme. • Waste acceptance procedure. • Waste management system for all incoming wastes and wastes on-site. • Appropriate storage and handling. • Wastewater management. • For hazardous waste transfer, the use of an extractive vent system linked to abatement equipment where applicable. • The provision of an impermeable surface across all areas of the facility where waste is handled and stored with kerbing or sloping to protect any adjacent permeable areas. • The minimisation of underground tanks and pipework. 	Applicable	In Place - As part of the existing Waste Licence all aspects of the required EMS system have been developed to encompass all aspects of environmental controls on site.
5.2	Emissions to Air	Applicable	In Place – Existing biofilter system on site
5.3	Emissions to Water		
5.3.1	Discharge to Surface Water	Applicable	In Place - There are no discharges from inside the process building to surface water. Only discharge is to surface water from shed roofs and outside yard areas. Surface water discharges are directed to a silt trap and oil/water separator system prior to discharge from the site. All leachate produced in the process buildings are directed to the closed leachate control system where it is re-circulated back into the process bays and not discharged from the site.
5.3.2	Discharge to Sewer/by tanker to sewer	Not Applicable	Not in Place: There are no discharges from the site to sewer.

BAT Ref.	BAT Statement	Applicability	State technique and whether it is in place or proposed for implementation
5.3.3	Discharge to Groundwater	Applicable	In Place – Existing impermeable concrete floor in reception building, at reception building ramp and inside the composting and maturation buildings eliminates discharge to groundwater from the facility. Proposed – On-going inspections of floor condition to ensure no cracks or breaks that could provide potential pathway.
5.3.4	Noise	Applicable	In Place – The air extraction fan for shed 1 and the reception building is located on the southern side of the building with noise screened from the closest noise sensitive receptor. Noise monitoring completed as part of the existing licence indicated that the operations are not causing noise nuisance. Proposed: The proposed new biofilter for sheds 2 and 3 would have 2 air extraction fans (1x 55kw - 67dBA at 3m distance and 1 x 37kw -65dBA at 3m). The fans will be located to the north of the sheds and so it is proposed that an acoustic barrier will be installed for both of these fans to mitigate noise nuisance.
6 BAT Associated Emission Levels			
6.1	Emission Levels for Discharges to Water	Applicable	In Place - Any surface water discharge will be assessed with relation to the European Communities Environmental Objectives (Surface Water) Regulations, 2009.
6.2	Emission Levels for Discharges to Sewer	Not Applicable	Not in Place: No discharge to sewer
6.3	Emission Levels For Discharges To Air		
6.3.1	Establishing Emission Limit Values	Not applicable	In Place – ELVs set in Waste Licence for the site and trigger levels are established for surface water at SW1.
6.3.2	Fugitive Air Emissions	Applicable	In Place – ELVs for dust deposition set in Waste Licence for the site
6.3.3	Odour Emissions	Applicable	In Place – ELVs for odorous compounds (i.e., mercaptans, ammonia and hydrogen sulphide) are set in Waste Licence for the site. Ongoing monitoring for these compounds is completed at boundary locations and nearest odour sensitive receptor locations.
7 Compliance Monitoring			
7.1	Monitoring Guidance		
7.2	Monitoring Of Emissions To Air	Applicable	In Place- Odour monitoring to be completed with reference to Air Guidance Note 5 (AG5) at boundary locations and/or nearest odour sensitive receptor locations.
7.3	Monitoring Of Aqueous Emissions	Not applicable	Not in Place: There will be no aqueous emissions as the leachate will be re-circulated in the closed leachate control system.
7.4	Monitoring Of Emissions To Groundwater	Applicable	In Place - Groundwater monitoring is completed as part of the Waste Licence Compliance Conditions.
7.5	Monitoring Of Wastes	Applicable	In Place - Waste entering the site is recorded on the weighbridge records as per SOP
7.6	Monitoring Of Noise Emissions	Applicable	In Place - Noise monitoring is carried out in accordance with the Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4), 2012, at a frequency as specified by the Agency

Title of Document BREF on Emissions from Storage (07.06)			
BAT Ref.	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
5.3.1 Open storage			
	BAT is to apply enclosed storage by using, for example, silos, bunkers, hoppers and containers, to eliminate the influence of wind and to prevent the formation of dust by wind as far as possible by primary measures. See Table 4.12 for these primary measures with cross-references to the relevant sections.	Not Applicable	In Place: The feedstock and compost material are stored inside facility buildings.
5.3.2.			
	Enclosed storage	Applicable	In Place - The feedstock and compost material is stored in facility Buildings. Floor of process shed and new waste reception building have impermeable concrete floors and will not allow any leaks or spills to migrate outside the facility buildings.
5.3.3	Storage of packaged dangerous solids	Not Applicable	Not in Place: No dangerous solids will be stored on the facility.
5.3.4			
	Preventing incidents and (major) accidents	Applicable	In Place - An accident prevention plan and incident procedure are in place as part of the site licence.
5.4			
Transfer and handling of solids			
5.4.1			
	General approaches to minimise dust from transfer and handling	Not Applicable	Not in Place: All unloading of feedstock and composted material takes place on the ramp at the reception building onto the reception floor. The ramp is located at the northern façade of the building with a rapid close door to minimise the escape of dust and litter. All other material movement and loading takes place inside the facility sheds.

Title of Document BREF for Energy Efficiency (02.09)			
BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
4.2.1	Energy efficiency management	Applicable	In Place – Assessment of the energy consumption and efficiency is completed on an annual basis at the site as part of the waste licence compliance conditions.
	BAT is to implement and adhere to an energy efficiency management system (ENEMS)	Applicable	In Place – Miltown complete an energy efficiency assessment as part of the licensing requirements to determine where energy savings could be achieved.
4.2.2.1	Continuous environmental improvement		
	BAT is to continuously minimise the environmental impact of an installation by planning actions and investments on an integrated basis and for the short, medium and long term, considering the cost benefits and cross-media effect	Applicable	In Place - The implementation of Objectives and targets within the EMS system ensure that continuous improvement is central to the environmental management of the facility.

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

Title of Document BREF for the Waste Treatment Industries (08.06)			
BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
	Environmental management 1. environmental management systems 2. provision of full details of the activities carried out on-site 3. having a good housekeeping procedure in place 4. having a close relationship with the waste producer/customer 5. the availability of qualified staff	Applicable	In Place - SOPs (Standard Operation Procedures) are in place and included within the application An EMS has been developed for the site as part of the licence compliance conditions.
Improve the knowledge of the waste input			
6	having a concrete knowledge of the waste input	Applicable	In Place - All companies delivering material to the facility have specific contracts for delivering specific waste types based on the EWC Code material acceptable at the facility.
7	implementing a pre-acceptance procedure	Applicable	In Place - All companies delivering material to the facility have specific contracts for delivering specific waste types based on the EWC Code material acceptable at the facility. Initial waste profiling and pre-clearance is carried out as per the waste acceptance SOP.
8	implementing an acceptance procedure	Applicable	In Place - A waste acceptance procedure has been developed for the site and included in the application.
9	implementing different sampling procedures	Not Applicable	Not in Place: Only waste materials included in the waste licence will be accepted
10	having a reception facility	Applicable	In Place – New Reception building exists at facility
Waste output			
11	analysing the waste output	Applicable	In Place: Waste/compost is analysed prior to shipment to final destination.
Management systems			
12	the traceability in waste treatment	Not Applicable	In Place: The site has a system in place whereby material can be traced from waste acceptance to despatch.
13	mixing/blending rules	Applicable	In Place - Given the nature of the wastes accepted there may be a requirement for blending with a bulking agent to ensure that the proper C:N ratio is achieved for optimum composting conditions.
14	segregation and compatibility procedures	Applicable	In Place – Any non-compatible waste will be transferred to quarantine area.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
15	the efficiency of waste treatment	Applicable	In Place – All composting bays are monitored on an on-going basis to ensure they are operating to an optimum level. Logging of waste batches allows management to track the efficiency of each batch processed.
16	accident management plan	Applicable	In Place – Milltown have prepared an accident management plan for the facility as part of their waste licence.
17	incident diary	Applicable	In Place – Incident diary for recording incidents is held in facility office.
18	noise and vibration management plans	Not Applicable	Noise and vibration are not considered an issue at the facility
19	decommissioning	Applicable	In Place – Residuals Management Plan and ELRA completed for site.
Utilities and raw material management			
20	energy consumption and generation	Applicable	In Place – Milltown complete an energy efficiency assessment as part of the licensing requirements to determine where energy savings could be achieved.
21	energy efficiency	Applicable	In Place – Milltown complete an energy efficiency assessment as part of the licensing requirements to determine where energy savings could be achieved.
22	internal benchmarking	Applicable	In Place – Benchmarking completed to compare year on year consumption.
23	the use of waste as a raw material plans	Not Applicable	Not in Place: The waste material cannot be used as a raw material in the process.
Storage and handling			
24	generic storage techniques	Applicable	In Place - As part of the site EMS an SOP has been developed for waste acceptance/handling and storage
(a)	to ensure storage areas are away from watercourses and sensitive perimeters, and located to eliminate or minimize the double handling of wastes within the installation	Applicable	In Place - Facility is located within a facility building with an impermeable concrete floor and berms around the doors to prevent any migration from the building floor.
(b)	to ensure that the storage area drainage infrastructure can contain all possible contaminated run-off and that drainage from incompatible wastes cannot come into contact with each other	Applicable	In place. Surface water run-off generated from inside the facility is directed to the closed leachate re-circulation system.
(c)	to ensure use of a dedicated area/store equipped with all necessary measures related to the specific risk of the wastes for sorting and repackaging laboratory smalls or similar waste.	Not Applicable	Not in Place: No lab waste on site

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
(d)	to handle odorous materials in fully enclosed or suitably abated vessels and storing them in enclosed buildings connected to abatement	Applicable	In place – Process Buildings connected to biofilter abatement system.
(e)	to ensure that all connections between the vessels are capable of being closed via valves.	Not Applicable	Not in Place: No waste liquids accepted on site
(f)	to ensure measures are available to prevent the building up of sludges higher than a certain level and the emergence of foams that may affect such measures in liquid tanks,	Not Applicable	Not in Place: No sludges or foams produced on site
(g)	equipping tanks and vessels with suitable abatement systems when volatile emissions may be generated.	Not Applicable	Not in Place: No volatile emissions from storage on site
(h)	to store organic waste liquid with a low flashpoint under a nitrogen atmosphere to keep it inertised	Not Applicable	Not in Place: No organic liquid with low flashpoint on site
25	to separately bund the liquid decanting and storage areas using bunds which are impermeable and resistant to the stored materials	Applicable	In-Place – Bunding around the fuel tank located in New Reception Building.
26	Tank and Process Pipework	Not Applicable	Not in Place: There are no tanks or associated pipework on site. With the exception of ducting for air input / exhaust and the leachate recirculation to the of water.
27	to take measures to avoid problems that may be generated from the storage/accumulation of waste	Applicable	Proposed –Storage plan to be developed for inside the facility as part of licence compliance.
28	generic handling techniques		
(a)	to have systems and procedures in place to ensure that wastes are transferred to the appropriate storage safely.	Applicable	In Place – Waste Handling SOP
(b)	to have a management system for the loading and unloading of waste in the installation, which also takes into consideration any risks that these activities may incur.	Applicable	In Place – Waste Handling SOP and Accident Prevention Policy as part of licence.
(c)	to ensure that a qualified person attends the site to check the laboratory smalls, the old original waste, waste from an unclear origin or undefined waste (especially if drummed), to classify the substances accordingly and to package into specific containers.	Not Applicable	Not in Place: No Lab waste accepted at site

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
(d)	to ensure that damaged hoses, valves and connections are not used	Not Applicable	Not in Place: No liquid waste stored on site
(e)	to collect exhaust gas from vessels and tanks when handling liquid waste	Not Applicable	Not in Place: No liquid waste stored on site
(f)	to unload solids and sludge in closed areas which are fitted with extractive vent systems linked to abatement equipment when the handled waste can potentially generate emission to air (e.g. odours, dust, VOCs)	Applicable	In Place – Reception and Process buildings linked to biofilter abatement system.
(g)	to use a system to ensure the bulking of different batches only takes place with compatibility testing	Not Applicable	Not in Place: Based on the types of wastes accepted on site there will be no need for compatibility testing.
29	to ensure that the bulking /mixing to or from packaged waste only takes place under instruction and supervision and is carried out by trained personnel	Applicable	In place - All waste handling is completed by experienced personnel.
30	to ensure that chemical incompatibilities guide the segregation required during storage	Not applicable	Not in Place: No chemical wastes accepted on site.
31	the techniques to handle containerised waste	Not Applicable	Not in Place: No containerisation of wastes in drums or containers
Other common techniques not mentioned before			
32	using extractive vents during crushing, shredding and sieving operations.	Applicable	Proposed - The proposed development will include some sieving of material following composting to remove impurities. A review of required extractive venting etc. will be assessed if required.
33	encapsulating the crushing and shredding of special waste	Not Applicable	Not in Place: No crushing or shredding of special waste completed on-site
34	washing processes	Applicable	In Place: Process Bays and equipment are washed on regular basis using power washers and biodegradable disinfectant, where required.
(a)	to identify the components that may be present in the items to be washed (e.g. solvents)	Not Applicable	Not in Place: No wash water discharge from site
(b)	to transfer washings to appropriate storage and then treating them in the same way as the waste from which they were derived.	Applicable	In Place: Wash water from the process bays and truck wash is transferred to leachate collection system.
(c)	to use treated waste water from the WT plant for washing instead of fresh water	Not Applicable	Not in Place: Wash water will be transferred to leachate collection system. Rain water is harvested for use on site.
Air emission treatments			
35	to restrict the use of open topped tanks, vessels and pits	Not Applicable	Not in Place: No open topped pits tanks or vessels on site

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
36	to use an enclosed system with extraction, or under depression, to a suitable abatement plant. This technique is especially relevant to processes which involve the transfer of volatile liquids, including during tanker charging/discharging	Not Applicable	Not in Place: No volatile liquids handled on site
37	to apply a suitably sized extraction system which can cover the holding tanks, pre-treatment areas, storage tanks, mixing/reaction tanks and the filter press areas, or to have in place a separate system to treat the vent gases from specific tanks	Not Applicable	Not in Place: No holding/pre-treatment tanks or storage tanks on site, with the exception of a small fuel tank and water tanks.
38	to correctly operate and maintain the abatement equipment, including the handling and treatment /disposal of spent scrubber media.	Applicable	In Place - The main air emission from the facility is considered to be nuisance odour. The installation and monitoring of effectiveness of the biofilter abatement system is completed as part of the waste licence compliance conditions
39	to have a scrubber system in place for the major inorganic gaseous releases from those unit operations which have a point discharge for process emissions	Not Applicable	Not in Place: The facility will not produce major inorganic gaseous releases
40	to have leak detection and repair procedures in place in installations a) handling a large number of piping components and storage and b) compounds that may leak easily and create an environmental problem	Not Applicable	Not in Place: The site does not handle a large number of piping components or use compounds that leak easily
41	to reduce air emission to the following levels VOC 7-20mg/Nm ³ and PM to 2-20mg/Nm ³	Not Applicable	Not in Place: The site does not have point emission sources for either VOC or PM
Waste Water Management			
42	Reduce the water use and the contamination of water	Applicable	In Place – Re-circulation of leachate from the process and re-use reduces freshwater usage and controls contaminated water.
(a)	to apply site waterproofing and storage retention methods.	Applicable	In Place – facility is located in covered shed buildings
(b)	to carry out regular checks of the tanks and pits especially when they are underground	Not Applicable	In Place: The leachate levels in the tanks are checked daily, the oil interceptor is checked daily for visible oil sheen, tank high level alarms are checked weekly.
(c)	to apply separated water drainage according to the pollution load (roof water, road water, process water)	Applicable	In Place – no process water discharge (re-circulation). Roof water and road water are combined when entering the surface water drainage system.
(d)	to apply a security collection basin	Applicable	In Place: Drainage diversion system exists whereby potentially impacted surface water from the delivery/turning area can be diverted to the leachate collection system if required.
(e)	to performing regular water audits, with the aim of reducing water consumption and preventing water contamination	Applicable	In Place - Water usage is very low for process, the water used in the process is harvested from the process buildings roofs. This plus the recirculation of leachate results in very little water requirement from on-site well.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
(f)	to segregate process water from rainwater	Not Applicable	Not in Place: No process water discharged from facility
43	effluent specification being suitable for the on-site effluent	Not Applicable	Not in Place: There is no waste water discharged from the facility process.
44	to avoid the effluent by-passing the treatment plant systems	Not Applicable	Not in Place: No Effluent discharged from the site. All leachate is re-circulated
45	to have in place and operate an enclosure system whereby rainwater falling on the processing areas is collected along with tanker washings, occasional spillages, drum washings, etc. and returned to the processing plant or collected in a combined interceptor	Not Applicable	Not in Place: Processing area is inside building. No Rain falling on process area.
46	to segregate the water collecting systems for potentially more contaminated waters from less contaminated water	Applicable	In Place – separate leachate collection system for inside the process buildings and surface water collection system for the buildings roofs and outside yard areas.
47	to have a full concrete base in the whole treatment area, that falls to internal site drainage systems which lead to storage tanks or to interceptors that can collect rainwater and any spillage. Interceptors with an overflow to sewer usually need automatic monitoring systems, such as pH checks, which can shut down the overflow	Applicable	In Place – Dedicated separate leachate collection system for inside the process buildings.
48	to collect the rainwater in a special basin for checking, treatment if contaminated and further use	Not Applicable	Not in Place: Surface water will only be from roofs and immediate road area. If required sampling of water quality may be completed to assess quality.
49	to maximise the re-use of treated waste waters and use of rainwater in the installation	Applicable	In Place – Rainwater harvesting and leachate recirculation takes place at the facility.
50	to conduct daily checks on the effluent management system and to maintain a log of all checks carried out, by having a system for monitoring the effluent discharge and sludge quality in place	Not Applicable	Not in Place: No effluent treatment on site.
51	to firstly identify waste waters that may contain hazardous compounds, secondly segregate the previously identified wastewater streams on-site and thirdly, specifically treat waste water on-site or off-site	Applicable	In Place - Separate leachate collection system for inside the process buildings and surface water collection system for the buildings roofs and outside yard areas.. Only potential hazard that may be discharged would be hydrocarbons in rainwater from road and this is transferred to the on-site oil / water interceptor for removal. All sanitary waste from welfare facilities discharged to on-site septic waste water treatment system.
52	to ultimately after the application of BAT number 42, select and carry out the appropriate treatment technique for each type of waste water	Applicable	In Place - Sanitary waste water is sent to a septic system and leachate is re-circulated within the process.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
53	to implement measures to increase the reliability with which the required control and abatement performance can be carried out.	Not Applicable	Not in Place No on-site water treatment completed.
54	to identify the main chemical constituents of the treated effluent and to then make an informed assessment of the fate of these chemicals in the environment	Not Applicable	Not in Place No on-site water treatment completed
55	to only discharge the waste water from its storage after the conclusion of all the treatment measures and a subsequent final inspection	Not Applicable	Not in Place No waste water storage on site.
56	to achieve the following water emission values before discharge Water parameter Emission values associated with the use of BAT (ppm) COD 20 – 120 BOD 2 – 20 Heavy metals (Cr, Cu, Ni, Pb, Zn) 0.1 – 1 Highly toxic heavy metals: As - <0.1 Hg – 0.01 – 0.05 Cd - <0.1 – 0.2 Cr(VI) - <0.1 – 0.4	Not Applicable	Not in Place No on-site water treatment completed
Management of the process generated residue			
57	residue management planning	Applicable	In Place: Organic residues (e.g., overs) are reintroduced to the process
58	to maximise the use of reusable packaging (drums, containers, IBCs, pallets, etc.)	Applicable	In Place – materials are reused where possible.
59	to re-use drums when they are in a good working state. In other cases, they are to be sent for appropriate treatment	Applicable	In Place – empty drums are either reused on site or returned to the supplier for reuse.
60	to keep a monitoring inventory of the waste on-site by using records of the amount of wastes received onsite and records of the wastes processed	Applicable	In Place – Miltown have weighbridge documentation on wastes received on site and records of the material shipped from the facility.
61	to re-use the waste from one activity/treatment possibly as a feedstock for another	Applicable	In Place – Overs material screened from the processed material may be re-introduced into a subsequent process batch as a bulking agent.
Soil contamination			
62	to provide and then maintain the surfaces of operational areas, including applying measures to prevent or quickly clear away leaks and spillages, and ensuring that maintenance of drainage systems and other subsurface structures is carried out	Applicable	In Place - The facility consists of an impermeable concrete slab floor that will contain any leaks or spills and negate any potential soil contamination.
63	to utilise an impermeable base and internal site drainage	Applicable	In place - All operational and waste storage areas have an impermeable base. There are separate surface water and leachate collection systems.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
64	to reduce the installation site and minimise the use of underground vessels and pipework	Not Applicable	In Place: Only limited underground piping for the leachate collection system.
BAT for specific types of waste treatments			
Biological treatments			
65	use the following techniques for storage and handling in biological systems	Applicable	
(a)	for less odour-intensive wastes, use automated and rapid action doors (opening times of the doors being kept to a minimum) in combination with an appropriate exhaust air collection device resulting in an under pressure in the hall	Applicable	In Place: The material accepted at the site is considered to be less odour intensive with no issues relating to neighbours in the area. The access doors to the waste reception shed are open for only short periods when material is being accepted. The reception building is linked to the existing air extraction and treatment (i.e., biofilter) system for Shed 1.
(b)	or highly odour-intensive wastes, use closed feed bunkers constructed with a vehicle sluice	Not Applicable	Not in Place: Material accepted at site is not considered to be highly odour intensive
(c)	House and equip the bunker area with an exhaust air collection device.	Not Applicable	Not in Place: No bunker area on site. Material is deposited onto the reception shed floor. The shed is linked to the existing air extraction and treatment (i.e., biofilter) system for Shed 1.
66	waste types and separation process		
	adjust the admissible waste types and separation processes according to the type of process carried out and the abatement technique applicable (e.g. depending on the content of non-biodegradable components) (see Section 4.2.3)	Applicable	In Place: The material is appropriately mixed with wood chip to achieve the best carbon:nitrogen ratio. Material is screened following processing to remove non-composted biodegradable material and non-biodegradable material.
67	techniques for anaerobic digestion	Not Applicable	Not in Place: All treatment on site is aerobic with no anaerobic treatment.
68	reducing the air emissions of dust, nitrogen oxides, sulphur oxides, carbon monoxide, hydrogen sulphide and volatile organic compounds when using biogas as fuel	Not Applicable	Not in Place: Biogas is not used as a fuel on site.
69	the techniques for mechanical biological treatments - improve the mechanical biological treatments (MBT) by:	Applicable	
(a)	using fully enclosed bioreactors	Not Applicable	Not in Place: Process bays with sheet covers are used for batch processing.
(b)	avoiding anaerobic conditions during aerobic treatment by controlling the digestion and the air supply (by using a stabilised air circuit) and by adapting the aeration to the actual biodegradation activity	Applicable	In Place: Processing material is monitored and forced aeration system is in place in each process bay to ensure that anaerobic conditions do not occur.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
(c)	using water efficiently	Applicable	In Place. Rain water is harvested for use in process. Also, waste water from the process is recirculated for use in the process bays.
(d)	thermally insulating the ceiling of the biological degradation hall in aerobic processes	Applicable	In Place – Thermally insulated ceilings are in place in the main process shed (i.e., shed 1) and the waste reception building.
(e)	minimising the exhaust gas production to levels of 2500 to 8000 Nm ³ per tonne. Levels below 2500 Nm ³ per tonne do not have been reported.	Not Applicable	Not In Place: Air input to the process bays is controlled and all exhaust gases from the process are removed with air changes within the process sheds to the biofilter system.
(f)	guaranteeing a uniform feed	Not Applicable	Not Currently in place – The majority of material currently processed on site is organic fines consisting of a mix of organic materials. When compost production is being completed then uniform feedstock would be required and secured.
(g)	recycling process waters or muddy residues within the aerobic treatment process to completely avoid water emissions. If waste water is generated, then this should be treated to reach the values mentioned in BAT number 56	Applicable	In Place - All process waste water is recycled back through the compost system.
(h)	continuously learning of the connection between the controlled variables of biological degradation and the measured (gaseous) emissions	Applicable	In Place: Assessment of gaseous emissions as part of the current licence requirements
(i)	reducing emissions of nitrogen compounds by optimising the C:N ratio.	Applicable	In Place: Bulking agent consisting of wood chip (carbon) is mixed through the composting material to provide optimum C:N ratio.
70	reduce the emissions from mechanical biological treatments to the following levels for treated exhaust gases: Odour (ouE/m ³) - <500 – 6,000 and NH ₃ mg/Nm ³ - <1-20 by using an appropriate combination of the following:	Applicable	In Place: The existing biofilter at the south of Shed 1 treats odour, ammonia and other gaseous emissions from process shed 1 and the waste reception building. The results for ammonia sampling completed at the biofilter were all <5ppm. Proposed: A proposed second biofilter to the north of shed 1 would treat air emissions from storage sheds 2 and 3 if approved by planning and the Agency.
(a)	maintaining good housekeeping (related to BAT number 3)	Applicable	In Place: Ongoing housekeeping is completed as part of the site management and existing licence W0270-01.
(b)	regenerative thermal oxidiser	Not Applicable	Not in Place: no thermal oxidiser in use on site or proposed for site
(c)	dust removal.	Applicable	In Place: Process air is removed from waste reception building and process shed 1 and treated in existing biofilter. Proposed: A proposed second biofilter to the north of sheds would treat air emissions from storage sheds 2 and 3 if approved by planning and the Agency.
71	Reduce the emissions to water to the levels mentioned in BAT number 56. In addition, restrict the emissions to water of total nitrogen, ammonia, nitrate and nitrite as well.	Applicable	In Place: On-going sealing of process building roofs to minimise condensate impact on surface water run-off. Proposed: Use of on-site ICW to polish surface water run-off prior to discharge from site.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
72	Physico-chemical treatments of waste waters	Not applicable	
(a)	clearly defining the objectives and the expected reaction chemistry for each treatment process	Not Applicable	Not in Place: No physio-chemical treatment takes place
(b)	assessing each new set of reactions and proposed mixes of wastes and reagents in a laboratory-scale test prior to waste treatment	Not Applicable	Not in Place: No physio-chemical treatment takes place on site
(c)	specifically designing and operating the reactor vessel so that it is fit for its intended purpose	Not Applicable	Not in Place: No physio-chemical treatment takes place on site
(d)	enclosing all treatment/reaction vessels and ensuring that they are vented to the air via an appropriate scrubbing and abatement system	Not Applicable	Not in Place: No physio-chemical treatment takes place on site
(e)	monitoring the reaction to ensure that it is under control and proceeding towards the anticipated result	Not Applicable	Not in Place: No physio-chemical treatment takes place on site
(f)	preventing the mixing of wastes or other streams that contain metals and complexing agents at the same time (see Section 4.3.1.3)	Not Applicable	Not in Place: No physio-chemical treatment takes place on site
73	in addition to the generic parameters identified for waste water in BAT number 56, additional parameters need to be identified for the physico-chemical treatment of waste waters. Some reference is given on this issue in the concluding remark Chapter 7	Not Applicable	Not in Place: No physio-chemical treatment takes place on site
74	apply the following techniques for the neutralisation process (see Section 4.3.1.3) a. ensuring that the customary measurement methods are used b. separately storing the neutralised waste water c. performing a final inspection of the neutralised waste water after a sufficient storage time has elapsed.	Not Applicable	Not in Place: No neutralisation process takes place on site
75	apply the following techniques to aid precipitation of the metals in treatment processes (see Section 4.3.1.4): a. adjusting the pH to the point of minimum solubility where the metals will precipitate b. avoiding the input of complexing agents, chromates and cyanides c. avoiding organic materials that may interfere with precipitation from entering the process d. allowing the resulting treated waste to clarify by decantation when possible, and/or by the addition of other dewatering equipment e. using sulphidic precipitation if complex agents are present. This technique may increase the sulphide concentration in the treated waste water.	Not Applicable	Not in Place: No precipitation of metals takes place on site

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
76	apply the following techniques to break-up emulsions (see Section 4.3.1.5): a. testing for the presence of cyanides in the emulsions to be treated. If cyanides are present, the emulsions need a special pre-treatment first b. setting up simulated laboratory tests.	Not Applicable	Not in Place: No break up of emulsions takes place on site
77	apply the following techniques to oxidation/reduction (see Section 4.3.1.6): a. abating the air emissions generated during the oxidation/reduction b. having safety measures and gas detectors in place (e.g. suitable for detecting HCN, H ₂ S, NO _x).	Not Applicable	Not in Place: No oxidation/reduction of chemicals takes place on site
78	apply the following techniques to waste waters containing cyanides (see Section 4.3.1.7): a. destroying the cyanides by oxidation b. adding caustic soda in excess to prevent a decrease in pH c. avoiding the mixing of cyanide wastes with acidic compounds d. monitoring the progress of the reaction using electropotentials.	Not Applicable	Not in Place: No treatment of waste waters containing cyanides takes place on site
79	apply the following techniques to waste waters containing chromium (VI) compounds (see Section 4.3.1.8): a. avoiding the mixing of Cr(VI) wastes with other wastes b. reducing Cr(VI) to Cr(III) c. precipitating the trivalent metal.	Not Applicable	Not in Place: No treatment of waste waters containing Chromium (VI) takes place on site.
80	apply the following techniques to waste waters containing nitrites (see Section 4.3.1.9): a. avoiding mixing nitrite wastes with other wastes b. checking and avoiding nitrous fumes during the oxidation/acidification treatment of nitrites.	Not Applicable	Not in Place: No treatment of waste waters containing nitrates takes place on site
81	apply the following techniques to waste waters containing ammonia (see Section 4.3.1.11):	Not Applicable	Not in Place: No treatment of waste waters containing ammonia takes place on site. All process waters containing ammonia is recirculated back onto the process material.
(a)	using a dual column air stripping system with an acidic scrubber for waste with ammonia solutions up to 20 w/w-%	Not Applicable	Not in Place: No treatment of waste waters containing ammonia
(b)	recovering the ammonia in the scrubbers and returning it to the process prior to the settlement stage	Not Applicable	Not in Place: No treatment of waste waters containing ammonia
(c)	removing the ammonia removed in the gas phase by scrubbing the waste with sulphuric acid to produce ammonium sulphate	Not Applicable	Not in Place: No treatment of gaseous ammonia – air in process sheds is treated in biofilter.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
(d)	extending any air sampling for ammonia in exhaust stacks or filter press areas to cover the VOCs in filtration and dewatering (see Section 4.3.1.12).	Not Applicable	Not in Place: No filtration or dewatering takes place on site.
82	link the air space above filtration and dewatering processes to the main abatement system of the plant (see Section 4.3.1.12)	Not Applicable	Not in Place: No filtration or dewatering takes place on site.
83	add flocculation agents to the sludge and waste water to be treated, to accelerate the sedimentation process and to facilitate the further separation of solids (see Section 4.3.1.16 for some applicability restrictions identified). To avoid use of flocculation agents, evaporation is better in those cases where it is economically viable (see Section 4.7.6.1)	Not Applicable	Not in Place: No water or sludge treatment as part of dewatering takes place on site.
84	apply rapid cleaning and steam- or high pressure water jet cleaning of the filter apertures of the sieving processes (see Section 4.3.1.17).	Applicable	In Place: Trommel system is cleaned using a power washer
For the physico-chemical treatment of solid wastes, BAT is to:			
85	promote the insolubilisation of amphoteric metals, and to reduce the leaching of toxic soluble salts by a suitable combination of water washing, evaporation, recrystallisation and acid extraction (see Section 4.3.2.1, 4.3.2.8, 4.3.2.9) when immobilisation is used to treat solid waste containing hazardous compounds for landfilling	Not Applicable	Not in Place: There will be no physio-chemical treatment of solid wastes on site.
86	test the leachability of inorganic compounds, by using the standardised CEN leaching procedures and by applying the appropriate testing level: basic characterisation, compliance testing or on-site verification (see Section 4.3.2.2)	Not Applicable	Not in Place: There will be no physio-chemical treatment of solid wastes on site.
87	restrict the acceptance of wastes to be treated by solidification/immobilisation treatment to those not containing high levels of VOCs, odorous components, solid cyanides, oxidising agents, chelating agents, high TOC wastes and gas cylinders (see Section 4.3.2.3)	Not Applicable	Not in Place: There will be no physio-chemical treatment of solid wastes on site.
88	apply control and enclosure techniques for loading/unloading and enclosed conveyor systems (see Section 4.3.2.3)	Not Applicable	Not in Place: There will be no physio-chemical treatment of solid wastes on site.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
89	have an abatement system(s) in place to handle the flow of air, as well as the peak loadings associated with charging and unloading (see Section 4.3.2.3)	Applicable	In Place: Process air is removed from waste reception building and process shed 1 and treated in existing biofilter. Proposed: A proposed second biofilter to the north of shed 3 would treat air emissions from storage sheds 2, 3 and 4 if approved by planning and the Agency to create negative pressure in shed buildings.
90	use at least a solidification, vitrification, melting or fusion process before landfilling solid waste according to techniques in Sections from 4.3.2.4 to 4.3.2.7.	Not Applicable	Not in Place: There will be no physio-chemical treatment of solid wastes on site.
For the physico-chemical treatment of contaminated soil, BAT is to:			
91	control the rate of excavation, the amount of contaminated soil area that is exposed, and the duration that soil piles are left uncovered during the excavation and removal of contaminated soil (see Section 4.3.2.10)	Not Applicable	Not in Place: There will be no physio-chemical treatment of contaminated soils on site.
92	use a bench-scale test to determine the suitability of the process to be applied and the best operational conditions for its use (see Section 4.3.2.11)	Not Applicable	Not in Place: There will be no physio-chemical treatment of contaminated soils on site.
93	have collection and control equipment in place such as afterburners, thermal oxidisers, fabric filters, activated carbon, or condensers for the treatment of the gases from thermal treatments (see Section 4.3.2.11)	Not Applicable	Not in Place: There will be no physio-chemical treatment of contaminated soils on site.
94	report the efficiency achieved during the processes for the different components reduced and also for those that have not been affected by the process (see Section 4.3.2.3)	Not Applicable	Not in Place: There will be no physio-chemical treatment of contaminated soils on site.
Recovery of materials from waste			
For the re-refining of waste oils, BAT is to			
95	operate a careful control of the incoming materials supported by analytical equipment (viscometry, infrared, chromatography and mass spectrometry as appropriate), laboratories and resources (see Section 4.1.1.1)	Not Applicable	Not in Place: There will be no re-refining of waste oils on site.
96	check at least for chlorinated solvents and PCBs (see Sections 4.1.1.1 and 4.4.1.2)	Not Applicable	Not in Place: There will be no re-refining of waste oils on site.
97	use condensation as a treatment for the gas phase of the flash distillation unit (see Section 4.6.8)	Not Applicable	Not in Place: There will be no re-refining of waste oils on site.
98	have vapour return lines for loading and unloading vehicles, routing all vents to a thermal oxidiser/incinerator or an activated carbon adsorption installation (see Sections 4.1.4.6, 4.6.7 and 4.6.14)	Not Applicable	Not in Place: There will be no re-refining of waste oils on site.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
99	direct vent streams to a thermal oxidiser with waste gas treatment if chlorinated species are present in the vent stream. If high levels of chlorinated species are present then condensation followed by caustic scrubbing and an activated carbon guard bed is the preferred treatment path (see Section 4.6)	Not Applicable	Not in Place: There will be no re-refining of waste oils on site.
100	utilise a thermal oxidation at 850 °C with a two seconds residence time for the vacuum distillation vent of vacuum generators or for the air from process heaters (see Section 4.6)	Not Applicable	Not in Place: There will be no re-refining of waste oils on site.
101	use a highly efficient vacuum system (see Section 4.4.1.1)	Not Applicable	Not in Place: There will be no re-refining of waste oils on site.
102	use the residues from vacuum distillation or thin film evaporators as asphalt products (see Section 4.4.1.15)	Not Applicable	Not in Place: There will be no re-refining of waste oils on site.
103	use a re-refining process of waste oil which can achieve a yield higher than 65 % on a dry basis (see Sections from 4.4.1.1 to 4.4.1.12)	Not Applicable	Not in Place: There will be no re-refining of waste oils on site.
104	achieve the following values in the discharged waste water from the re-refining unit (see Section 4.4.1.14): Hydrocarbons (<0.01 – 5ppm), Phenols (0.15 – 0.45ppm). For other water parameters, refer to BAT number 56 in the Generic BAT section.	Not Applicable	Not in Place: There will be no re-refining of waste oils on site.
For the treatment of waste solvent, BAT is to:			
105	operate a careful control of the incoming materials as supported by analytical equipment, laboratories and resources (see Section 4.1.1.1)	Not Applicable	Not in Place: There will be no waste solvent treatment on site.
106	evaporate the residue from the distillation columns and to recuperate the solvents (see Section 4.4.2.4)	Not Applicable	Not in Place: There will be no waste solvent treatment on site.
For the regeneration of waste catalyst, BAT is to:			
107	use bag filters to abate particulates from the fumes generated during the regeneration process (see Sections 4.4.3 and 4.6.5)	Not Applicable	Not in Place: There will be no regeneration of waste catalyst on site.
108	use a SOx abatement system (see Section 4.4.3.3).	Not Applicable	Not in Place: There will be no regeneration of waste catalyst on site.
For the regeneration of waste activated carbon, BAT is to:			

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
109	have an effective quality control procedure in place to ensure that the operator can differentiate between the carbon used for potable water or food grade carbon and the rest of spent carbons (the so-called 'industrial carbons') (see Section 4.4.4.2)	Not Applicable	Not in Place: There will be no regeneration of waste activated carbon on site.
110	require a written undertaking from customers indicating what the activated carbon has been used for (see Section 4.1.2.3 and this is also related to BAT number 12.c)	Not Applicable	Not in Place: There will be no regeneration of waste activated carbon on site.
111	utilise an indirect fired kiln for industrial carbons –it may be argued that this could equally be applied to potable water carbons. However, limits on capacity and corrosion may deem that only multiple hearth or direct fired rotary kilns may be used (see Section 4.4.4.1)	Not Applicable	Not in Place: There will be no regeneration of waste activated carbon on site.
112	utilise an afterburner with a minimum of 1100 °C, two seconds residence time and 6 %excess oxygen for the regeneration of industrial carbons where refractory halogenated or other thermally resistant substances are likely to be present. In other cases, less stringent thermal conditions are sufficient (see Section 4.4.4.2)	Not Applicable	Not in Place: There will be no regeneration of waste activated carbon on site.
113	utilise an afterburner with a minimum heating temperature of 850 °C, two seconds residence time and 6 % excess oxygen for potable water and food grade active carbons (see Section 4.4.4.2)	Not Applicable	Not in Place: There will be no regeneration of waste activated carbon on site.
114	apply a flue-gas treatment train consisting of quench and/or venturi and aqueous scrubbing sections, followed by an induced draft fan (see Section 4.4.4.2)	Not Applicable	Not in Place: There will be no regeneration of waste activated carbon on site.
115	utilise a caustic or soda ash scrubbing solutions to neutralise acid gases for industrial carbon plants (see Section 4.4.4.2)	Not Applicable	Not in Place: There will be no regeneration of waste activated carbon on site.
116	have a WWTP containing an appropriate combination of flocculation, settlement, filtration and pH adjustment for the treatment of potable water carbons. For effluents of industrial carbons, applying additional treatments (e.g. metal hydroxide precipitation, sulphide precipitation) are also considered BAT (see Section 4.4.4.3).	Not Applicable	Not in Place: There will be no regeneration of waste activated carbon on site.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
Preparation of waste to be used as fuel			
For the preparation of waste to be used as fuel, BAT is to:			
117	try to have a close relationship with the waste fuel user in order that a proper transfer of the knowledge of the waste fuel composition is carried out (see Section 4.5.1)	Not Applicable	Not in Place: The material accepted on site will be for bio drying only to reduce the moisture content of the waste and improve the calorific value of the material on behalf of a fuel processor. Once dried to the required level the material will be removed by the fuel processor for processing to RDF. The details of the fuel composition will be agreed between the fuel processor and the final fuel user only.
118	have a quality assurance system to guarantee the characteristics of the waste fuel produced (see Section 4.5.1)	Not Applicable	Not in Place: The material accepted on site will be supplied by a third party for biodrying. The quality assurance system for the fuel will be agreed between the waste material supplier and the final fuel user.
119	manufacture different type of waste fuels according to the type of user (e.g. cement kilns, different power plants), to the type of furnace (e.g. grate firing, blow feeding) and to the type of waste used to manufacture the waste (e.g. hazardous waste, municipal solid waste)(see Section 4.5.2)	Not Applicable	Not in Place: The material accepted on site will be for bio drying only to reduce the moisture content of the waste and improve the calorific value of the material on behalf of a fuel processor. Once dried to the required level the material will be removed by the fuel processor for processing the grades of RDF to suit their client specifications.
120	<i>when producing waste fuel from hazardous waste, use activated carbon treatment for low contaminated water and thermal treatment for highly polluted water (see Sections 4.5.6 and 4.7). In this context, thermal treatment relates to any thermal treatment in Section 4.7.6 or incineration which is not covered in this document</i>	Not Applicable	Not in Place: No hazardous waste will be accepted on site
121	<i>when producing waste fuel from hazardous waste, ensure correct follow-up of the rules concerning electrostatic and flammability hazards for safety reasons (see Sections 4.1.2.7 and 4.1.7)</i>	Not Applicable	Not in Place: No hazardous waste will be accepted on site
For the preparation of solid waste fuels from non-hazardous waste, BAT is to:			
122	visually inspect the incoming waste to sort out the bulky metallic or non-metallic parts. The purpose is to protect the plant against mechanical destruction (see Section 4.1.1.3 and this is also related to BAT 8.e)	Not Applicable	Not in Place: The material accepted on site will be for bio drying only. Any physical processing of the waste will be completed by the fuel processor supplying the material for biodrying prior to the material arriving on site.
123	use magnetic ferrous and non-ferrous metal separators. The purpose is to protect the pelletisers as well as fulfil the requirements of the final users (see Sections 4.5.3.3 and 4.5.3.4)	Not Applicable	Not in Place: The material accepted on site will be for bio drying only. Any physical processing of the waste will be completed by the supplier prior to the material arriving on site.
124	make use of the NIR technique for the sorting out of plastics. The purpose is the reduction of organic chlorine and some metals which are part of the plastics (see Section 4.5.3.10)	Not Application	Not in Place: The material accepted on site will be for bio drying only. Any physical processing of the waste will be completed by the supplier prior to the material arriving on site.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
125	use a combination of shredder systems and pelletisers suitable for the preparation of the specified size waste fuel (see Sections 4.5.3.1 and 4.5.3.12) For some installations preparing solid waste fuels from source-separated waste streams, the use of some or all of the above-mentioned techniques may not be necessary to comply with BAT (see Section 4.5.3.1)	Not Applicable	Not in Place: The material accepted on site will be for bio drying only. Any physical processing of the waste will be completed by the supplier prior to the material arriving on site.
For the preparation of solid waste fuel from hazardous waste, BAT is to:			
126	<i>consider emissions and flammability hazards in case a drying or heating operation is required (see Sections 4.1.2.7 and 4.5.4.1)</i>	Not Applicable	Not in Place: No hazardous waste will be accepted on site
127	<i>consider carrying out the mixing and blending operations in closed areas with appropriate atmosphere control systems (see Sections 4.1.4.5, 4.5.4.1 and 4.6)</i>	Not Applicable	Not in Place: No hazardous waste will be accepted on site
128	<i>use bags filters for the abatement of particulates (see Section 4.6.26)</i>	Not Applicable	Not in Place: No hazardous waste will be accepted on site
For the preparation of liquid waste fuels from hazardous waste, BAT is to:			
129	<i>use heat-exchange units external to the vessel if heating of the liquid fuel is required (Section 4.5.4.1)</i>	Not Applicable	Not in Place: No hazardous waste will be accepted on site
130	<i>adapt the suspended solid content to ensure the homogeneity of the liquid fuel (see Section 4.5.4.1)</i>	Not Applicable	Not in Place: No hazardous waste will be accepted on site

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

Title of Document BAT Guidance Note For Disposal or Recycling of Animal Carcasses and Animal Waste Sector			
BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
5.2.1 General Process and Operations			
5.2.1.1 BAT for Animal by-Product Installations			
	use an environmental management system (see BREF Sections 4.1.1 & 5.1.1.1)	Applicable	In Place - SOPs (Standard Operation Procedures) are in place as part of the existing site licence. An EMS has been developed for the site as part of the licence compliance conditions.
	provide employee training (see BREF Section 4.1.2)	Applicable	In Place: Employee awareness and training is completed as required under schedule 2.2.2.6 of the existing site waste licence.
	use a planned maintenance programme (see BREF Section 4.1.3)	Applicable	In Place: Preventative maintenance is completed as required under schedule 2.2.2.8 of the existing site waste licence.
	apply dedicated metering of water consumption (see BREF Section 4.1.4)	Not Applicable	Not In Place: Water used in the process and ancillary works is harvested rainwater from the facility roofs. The other water source on site is from an on-site well which is un-metered.
	separate process and non-process waste water (see BREF Section 4.1.5)	Applicable	In Place: Process wastewater is managed through a recirculation system where it is stored and recirculated back to the process bays. Surface water from the roofs and clean yard surfaces is directed to a separate surface water drainage system.
	remove all running water hoses and repair dripping taps and toilets (see BREF Section 4.1.7)	Applicable	In Place: The preventative maintenance program under schedule 2.2.2.8 of the existing site waste licence would include repairs to hoses and taps.
	fit and use drains with screens and/or traps to prevent solid material from entering the wastewater (see BREF Section 4.1.11)	Applicable	In Place: surface water drains and process drains have silt traps installed to collect solids.
	dry clean installations and transport by-products dry (see BREF Section 4.1.12), followed by pressure cleaning (see BREF Section 4.1.10) using hoses fitted with hand operated triggers (see BREF Section 4.1.9) and where necessary hot water supplied from thermostatically controlled steam and water valves (see BREF Section 4.1.23)	Applicable	In place: When required process bays are washed with power washer and sprayed with biodegradable disinfectant.
	operate continuous, dry and segregated collection of animal by-products throughout processing (see BREF Section 4.3.1.1)	Applicable	In Place: Material is separated through a batching system within the process bays.
	use sealed storage, handling and charging facilities for animal by-products, e.g. storage areas working under negative pressure (see BREF Section 4.3.1.3)	Applicable	In Place: Process air is removed from waste reception building and process shed 1 and treated in existing biofilter to create negative pressure conditions. Proposed: It is proposed to install an air extraction system in sheds 2 and 3 to provide negative air conditions. A proposed second biofilter to the north of shed 3 would treat the extracted air if approved by planning and the Agency.
	where it is not possible to treat animal by-products before their decomposition starts to cause odour problems and/or quality problems, refrigerate them as quickly as possible and for as short a time as possible (see BREF Section 4.3.1.4)	Not Applicable	In Place: all organic material accepted on site that could contain animal by-products are processed as quickly as possible to reduce the potential creation of odours. Air in the waste reception area is extracted to the site biofilter for treatment.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
	where inherently malodorous substances are used or are produced during the treatment of animal by-products, pass the low intensity/high volume gases through a biofilter (see BREF Section 4.1.33)	Applicable	In Place: all organic material accepted on site that could contain animal by-products are processed as quickly as possible to reduce the potential creation of odours. Air in the waste reception area is extracted to the site biofilter for treatment.
	apply overfilling protection on bulk storage tanks (see BREF Section 4.1.13)	Applicable	In Place: High level alarm in place on leachate holding tank
	provide and use bunds for bulk storage tanks (see BREF Section 4.1.14)	Applicable	In Place: Fuel storage tank is located in concrete bund inside a dedicated structure
	implement energy management systems (see BREF Sections 4.1.16 & 4.1.17)	Applicable	In Place: Energy usage is monitored on an on-going basis
	implement refrigeration management systems (see BREF Section 4.1.18)	Not Applicable	Not In Place: No refrigeration takes place on site
	operate controls over refrigeration plant running times (see BREF Section 4.1.19)	Not Applicable	Not In Place: No refrigeration takes place on site
	use thermostatically controlled steam and water blending valves (see BREF Section 4.1.23)	Not Applicable	Not In Place: No steam services in place on site
	rationalise and insulate steam and water pipework (see BREF Section 4.1.24)	Not Applicable	Not In Place: No steam services in place on site
	isolate steam and water services (see BREF Section 4.1.25)	Not Applicable	Not In Place: No steam services in place on site
	implement light management systems (see BREF Section 4.1.26)	Applicable	In Place: Energy usage is monitored on an on-going basis
	store animal by-products for short periods and possibly refrigerate them (see BREF Section 4.1.27)	Not Applicable	In Place: all organic material accepted on site that could contain animal by-products are processed as quickly as possible to reduce the potential creation of odours. Air in the waste reception area is extracted to the site biofilter for treatment.
	audit odour (see BREF Section 4.1.28)	Applicable	In Place: Odour compounds sampling is completed as required under Schedule C.1.2 of the existing waste licence and an odour management plan is in place for the site.
	design and construct vehicles, equipment and premises to ensure that they are easy to clean (see BREF Section 4.1.30)	Applicable	In Place: Premises is designed and constructed to be easily cleaned using on-site power washer. Equipment used on site is designed by manufacturer to be easily cleaned using power washer units.
	clean material storage areas frequently (see BREF Section 4.1.31)	Applicable	In Place: Waste Storage areas are cleaned when empty

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
	implement a noise management system (see BREF Section 4.1.36)	Applicable	<p>In Place – The air extraction fan for shed 1 and the reception building is located on the southern side of the building with noise screened from the closest noise sensitive receptor. Noise monitoring completed as part of the existing licence indicated that the operations are not causing noise nuisance.</p> <p>Proposed: The proposed new biofilter for sheds 2 and 3 would have 2 air extraction fans (1x 55kw - 67dBA at 3m distance and 1 x 37kw -65dBA at 3m). The fans will be located to the north of the sheds and so it is proposed that an acoustic barrier will be installed for both of these fans to mitigate noise nuisance.</p>
	reduce noise at, e.g. roof extract fans, balance lagoon blowers and refrigeration plants (see BREF Sections 4.1.3. & 4.1.36)	Applicable	<p>In Place – There are no fans on building roofs, all fans are at ground level to reduce potential noise impacts. The air extraction fan for shed 1 and the reception building is located on the southern side of the building with noise screened from the closest noise sensitive receptor. Noise monitoring completed as part of the existing licence indicated that the operations are not causing noise nuisance.</p> <p>Proposed: The proposed new biofilter for sheds 2 and 3 would have 2 air extraction fans (1x 55kw - 67dBA at 3m distance and 1 x 37kw -65dBA at 3m). The fans will be located to the north of the sheds and so it is proposed that an acoustic barrier will be installed for both of these fans to mitigate noise nuisance.</p>
	replace the use of oil with natural gas, where a natural gas supply is available (see BREF Sections 4.1.37. & 4.1.38)	Not Applicable	Not In Place: No natural gas supply exists at the site
	enclose animal by-products during transport, loading/unloading and storage (see BREF Sections 4.1.40. & 4.1.39)	Applicable	In Place: All deliveries of organic waste (which may contain elements of animal by-products) are delivered in enclosed container trucks.
	where it is not possible to treat blood before its decomposition starts to cause odour problems and/or quality problems, refrigerate it as quickly as possible and for as short a time as possible, to minimise decomposition (see BREF Section 4.2.1.8)	Not Applicable	Not In place: The material processed on site is mainly organic solid waste and no processing of blood material takes place on site.
	export any heat and/or power produced which cannot be used on site.	Not Applicable	Not In Place: No excess heat or power produced from composting that could currently be exported.
5.2.1.2 BAT for Environmental Management			
	BAT is to implement and adhere to an Environmental Management System (EMS) that incorporates the standard features associated with a management system. See Section 5.1.1.1 of BREF for further information on Environmental Management Systems.	Applicable	In Place: An EMS is in place under the existing waste licence for the site.

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
5.2.2 Integration of Same Site Activities			
For animal by-product installations, operating on the same site, BAT is to do the following:			
	re-use heat and/or power produced in one activity in other activities (see BREF Sections 4.4.1, 4.4.2 & 4.4.3),	Applicable	In Place: Heat produced by process bays are retained under tarp covers to enhance composting conditions. If required, the facility can recirculate process air into the composting bays in order to retain high temperatures, especially during cold weather.
	share abatement techniques, where these are required, e.g. WWTPs.	Not Applicable	Not In Place: No sharing of abatement techniques takes place
For rendering and incineration on the same site, BAT is to do the following:			
	burn non-condensable gases produced during rendering (see BREF Sections 4.4.2 & 4.4.3).	Not Applicable	Not In Place: No Rendering takes place on site
5.2.3 Installation and Equipment Cleaning			
For the cleaning of animal by-product installations BAT is to do the following:			
	Manage and minimise the quantities of water and detergents used (see BREF Section 4.1.42.1)	Applicable	In Place: Harvested rainwater is used where possible.
	Select those detergents which cause minimum impact on the environment, without compromising the efficacy of cleaning (see BREF Section 4.1.42.2)	Applicable	In Place: Biodegradable detergents used on site.
	Avoid, where possible, the use of cleaning and infection agents containing active chlorine (see BREF Section 4.1.42.3), and	Applicable	In Place: Only biodegradable cleaning and infection agents not containing active chlorine are used
	Where the equipment is suitable, operate a cleaning-in-place system (see BREF Section 4.2.4.3).	Applicable	In Place: Where required equipment is cleaned in-situ using air and power washers.
5.2.4 Treatment of Wastewater			
For all animal by-product installations BAT is to minimise the quantity and load of wastewater generated using the measures outlined in this document, then to treat the wastewater as follows			
	prevent wastewater stagnation (see BREF Section 4.1.43.3)	Applicable	In Place: Waste water in recirculation system is moved through the system as quickly as possible. Due to the heat and water loss in the process there is a requirement for use of the water on a regular basis.
	apply an initial screening of solids using sieves at the animal by-product installation (see BREF Section 4.1.43.4)	Applicable	In Place: No sieves, but silt traps are in place to collect solids prior to the wastewater transfer to the holding tank and recirculation to process.
	remove fat from wastewater, using a fat trap (see BREF Section 4.1.43.9)	Not Applicable	Not in Place: There is typically a low volume of waste water produced from the process. Any wastewater is directed to the leachate recirculation system. Any sediment (including fats) that may settle in the holding tank are removed on a regular basis and added to incoming material for processing.
	use a flotation plant, possibly combined with the use of flocculants, to remove additional solids (see BREF Section 4.1.43.10)	Not Applicable	Not in Place: No wastewater treatment takes place on site. Wastewater from the process is recirculated back into the process bays

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
	use a wastewater equalisation tank (see BREF Section 4.1.43.11)	Not Applicable	Not In Place: No wastewater treatment takes place on site. Wastewater from the process is recirculated back into the process bays
	provide wastewater holding capacity in excess of routine requirements (see BREF Section 4.1.43.1)	Applicable	In Place: A holding tank is in place to the south of process shed 1 with a volume of 54.55m ³ which is a holding capacity that exceeds normal requirements.
	prevent liquid seepage and odour emissions from wastewater treatment tanks, by sealing their sides and bases and either covering them or aerating them (see BREF Sections 4.1.43.12 & 4.1.43.13)	Not Applicable	Not In Place: No wastewater treatment takes place on site. Wastewater from the process is recirculated back into the process bays
	subject the effluent to a biological treatment process. These may include the following: <ul style="list-style-type: none"> • anaerobic pre-treatment using down-flow or up-flow reactors • aerobic digestion combined with intermittent or alternating denitrification under anoxic conditions. Biological wastewater treatment, or, • biological wastewater treatment using overpressure in conjunction with ultrafiltration 	Not Applicable	In Place: Waste water is recirculated back into the aerobic biological process where it is consumed by the process.
5.3 BAT – PREVENTATIVE MEASURES FOR SPECIFIC UNIT OPERATIONS			
5.3.1 Additional BAT For Fat Melting	For fat melting no additional BAT have been identified in addition to those listed in 5.2 above.	Not Applicable	Not In Place: The site is for composting and biostabilisation of organic wastes only. No Fat Melting takes place on site
5.3.2 Additional BAT For Rendering	In addition to those listed in Section 5.2 above, for rendering installations, BAT is to do the following:	Not Applicable	Not In Place: The site is for composting and biostabilisation of organic wastes only. No Rendering takes place on site
5.3.3 Additional BAT For Blood Manufacture	In addition to those listed in Section 5.2 above, for blood processing installations, BAT is to do one of the following: <ul style="list-style-type: none"> • concentrate plasma, prior to spray drying, using reverse osmosis (see BREF Section 4.3.5.1) • concentrate plasma, prior to spray drying, using vacuum evaporation, (see BREF Section 4.3.5.2), or • remove water from blood, by steam coagulation, prior to spray drying (see BREF Section 4.3.4.4). 	Not Applicable	Not In Place: The site is for composting and biostabilisation of organic wastes only. No Blood processing takes place on site
5.3.4 Additional BAT For Bone Manufacture	For bone processing, no additional BAT has been identified in addition to those in Section 5.2.	Not Applicable	Not In Place: The site is for composting and biostabilisation of organic wastes only. No bone manufacturing takes place on site

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation	
5.3.5 Additional BAT For Gelatine Manufacture	In addition to those listed in Section 5.2 above, for gelatine manufacturing installations, BAT is to do the following: <ul style="list-style-type: none"> insulate bone de-fatting equipment (see BREF Section 4.3.7.1). 	Not Applicable	Not In Place: The site is for composting and biostabilisation of organic wastes only. No Gelatine Manufacturing takes place on site.	
5.3.6 Additional BAT For Gas Production	In addition to the general measures listed in Section 5.2 for biogas production, BAT is to do the following: <ul style="list-style-type: none"> re-use heat during biogas production, through the use of heat exchangers (see BREF Section 4.3.10.3). 	Not Applicable	Not In Place: The site is for composting and biostabilisation of organic wastes only. No Gas Production takes place on site.	
5.3.7 Additional BAT For Composting	In addition to the general measures listed in Section 5.2 for composting animal by-products, BAT is to do the following: <ul style="list-style-type: none"> provide sufficient drainage capacity for a windrow on a hard standing (see BREF Section 4.3.11.1) constructed from concrete (see BREF Section 4.3.11.2). 	Applicable	In Place: Following processing in concrete bays the material is stored in windrows in storage sheds that have concrete floors and sufficient drainage capacity. Material only has 40% moisture content so there is very little water runoff from the windrows.	
6. BAT ASSOCIATED EMISSION LEVELS				
6.1 EMISSION LEVELS FOR DISCHARGES TO AIR	The BAT emission levels for emissions to air are as follows:		Applicable In Place: Sampling and monitoring is completed as part of the existing site licence to assess the emission concentrations against the limits set out in Schedule B of the existing site waste license.	
	Emission	Emission Level		Mass Emission Level <small>Note 1</small>
	Ammonia	50 ppm v/v		150,000 mg/h
	Amines	5 ppm v/v		-
	Hydrogen Sulphide and Mercaptans	5 ppm v/v		15,000 mg/h
	Total Particulate Matter (including emissions from material handling)	5 – 50 150		At mass flow >0.2kg/hr At mass flow up to 0.2kg/hr
	Total Organic Carbon (as C)	50mg/m ³		500

BAT Ref	BAT Statement	Applicability	State technique and whether it is in place or state schedule for implementation
	<p>EMISSION LEVELS FOR ODOUR</p> <p>The ELV for odour measured at the nearest odour sensitive receptor beyond the facilities boundary will be set at <1.5 OUE/m³ – 98- percentile of 1 – hourly average concentration³, above that of recorded background concentrations.</p> <p>For existing facilities the ELV for odour measured at the nearest odour sensitive receptors is set at <5.0 OUE/m³ - 98-percentile of 1 - hourly average concentration, above that of recorded background concentrations.</p> <p>prEN13725 Air Quality – Determination of Odour Concentration by Dynamic Olfactometry.</p> <p>EPA (2001) Odour Impacts and Odour Emission Control Measures for Intensive Agriculture.</p>	Applicable	<p>In Place: Odour sampling and monitoring is completed annually as part of Schedule C of the existing site licence to assess odour emission concentrations.</p> <p>Proposed: An odour assessment model for the site is being completed as part of the licence application process to assess the odour concentrations at the closest sensitive receptors. The model will be submitted to the Agency in August 2018.</p>



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

ATTACHMENT 2

Surface Water Drawing

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

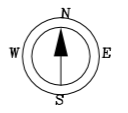
For inspection purposes only.
Consent of copyright owner required for any other use.

Legend:
Existing Surface water Pathway - 
Proposed Surface water Pathway - 

JRE Purcellsinch Business Park
Carlow Road
Kilkenny
Phone 056 7712826
email: info@jre.ie

Title: Site Plan of Miltown Composting Systems Ltd. Facility
Details of: Existing and Proposed Surface water Pathways

Date July 2018	Scale 1:500 A1 1:1000 A3	Drawing No 01-3	Drawn By
-------------------	--------------------------------	--------------------	----------



ATTACHMENT 3

Updated Non-Technical Summary

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