

# EPA Application Form

## 9.1 - Environmental Management Techniques - Attachment

Organisation Name: \*

Dublin City Council

Application I.D.: \*

LA003612

*Authorisation Application Form*

**Amendments to this Application Form Attachment**

<b>Version No.</b>	<b>Date</b>	<b>Amendment since previous version</b>	<b>Reason</b>
V.1.0	July 2017	N/A	Online application form attachment
As above	Mar 2018	Identification of required fields	Assist correct completion of attachment

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

### 9.1. Accident Prevention Measures

#### Measures to prevent accidental emissions and liabilities

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

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

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

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

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

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

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

Measure *	Surveillance Measures		
	Description *	Frequency of Surveillance *	Method / Standard *
Fuel/Oil Separators	Separators installed on surface water drainage network to prevent release of hydrocarbon contamination to the surface water sewer network in the event of an accident or spillage on the site. Interceptors (as detailed in the Engineering Services Report) will be installed in accordance with the manufacturer's recommendations.	Inspection of chambers as per manufacturer's recommendations and cleaning as required.	Specialist drain cleaning contractors will be employed.
Spill Kits	Spill kits will be available across the facility which will include absorbent material to protect surface water drains.	For use as required.	Staff at the BRC will be trained in the appropriate use of spill kits and management of contaminated absorbents.
Impervious Surface	The BRC facility access roads and operational waste areas will be constructed of impervious materials. Any potential accident or release of waste material from haulage vehicles either entering or exiting the facility will occur on impervious surfaces and can be easily cleaned up and transferred to appropriate waste containers.	Not Applicable.	Accidents resulting in release of solid waste can be cleaned up by JCB equipment at facility. Spillage or release of any liquid waste will be contained using spill kits and any clean-up works of the drainage network will be carried out by specialist contractors.
Training/Induction	Existing and new staff working at the BRC will be inducted to the facility and given training on the locations of spill kits, assembly points, fire	Not Applicable.	Not Applicable.

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

\* indicates required field

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Measure *	Surveillance Measures		
	Description *	Frequency of Surveillance *	Method / Standard *
	extinguishers/hoses/reels and emergency contact numbers.		
Emergency & Spill Response Procedures	DCC will develop and maintain Procedures including emergency and spill responses for the BRC. These procedures will identify reporting procedures for incidents, notification requirements, assembly points and contact details. It is anticipated that the Agency will Condition the preparation of such plans in accordance with a Waste Licence grant.	Not Applicable.	Not Applicable.

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\*add rows to the table as necessary

\* indicates required field



### Authorisation Application Form

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

The adjoining NCOD facility (including the NCOD operations outside of the waste licence boundary) will be operational 24 hrs a day with a waste management night crew and winter roads maintenance crew (road salting) operating through the night. Security will be in place at the main depot outside of the normal working hours.

The Emergency Response Procedure to be developed for the BRC will include out of hours contact details for the Facility Manager or other suitable appointed person. An Emergency Contact Number will also be posted on the Facility Notice Board at the entrance from Carton Way.

#### Soil Monitoring Points

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

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

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

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

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

\* indicates required field



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\*add rows to the table as necessary

#### Soil Parameters

Complete the table below with details of soil monitoring parameters (where a baseline report is required in accordance with Section 86B of the EPA Act 1992 as amended). (If different parameters are associated with different monitoring points this should also be identified in the table below.)

Parameter	Unit	Trigger Level	How was the trigger level determined?	Proposed Monitoring Frequency	Sample Method	Analysis Method / Technique

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\*add rows to the table as necessary

\* indicates required field

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### Groundwater Monitoring Points

Based on the assessment(s) carried out previously or as part of this licence application, complete the table below with summary details of the groundwater monitoring points.

Is groundwater monitoring proposed at the installation/facility? (Yes/No): \*

No

Monitoring Point Code	Monitoring Point Grid Ref.	
	Easting <sup>6</sup>	Northing <sup>7</sup>

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\*add rows to the table as necessary

<sup>6</sup> Six Digit GPS Irish National Grid Reference  
<sup>7</sup> Six Digit GPS Irish National Grid Reference

\* indicates required field







## Authorisation Application Form

### Costed Environmental Liabilities Risk Assessment (ELRA)

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

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

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

Costed **ELRA** document filename:

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

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

**Financial Provision Proposal** filename:

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

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

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

\* indicates required field

## Authorisation Application Form

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

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

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

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

CRAMP filename:

Not Applicable

### Costed CRAMP

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

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

No

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

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

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



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

State preferred form of financial provision instrument?	Not Applicable
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Upload a financial provision proposal (where required) having regard to the Environmental Protection Agency's Guidance on Financial Provision (2015) in making financial provision to cover any liabilities (select Document Type: **Financial Provision Proposal** in the application form)

**Financial Provision Proposal** filename:

### **Cessation of Activity**

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

Refer to Attachment-9-3-ELRA CRAMP Requirements
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### **Emergency Response Procedure**

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

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

\* indicates required field

## Authorisation Application Form

### 9.2. Nuisance

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

Type of Nuisance	Applicable to the activity? * (Yes/No/ Not Applicable)	Techniques to prevent nuisances *	Where nuisances cannot be prevented, techniques to be used to minimise and reduce nuisances
Odour	Yes	Waste is transported to the facility and transferred immediately to waste containers. Skips and containers will be removed from site on a regular basis to reduce potential for biodegradable material to generate odours at the facility. It is not proposed to accept mixed municipal waste (black bag waste) at the facility in accordance with the relevant Planning Conditions.	Waste brought to the facility (particularly waste with the potential to generate odours) will be regularly removed from the facility and containers will be enclosed to limit odour release.
Fire Control	Yes	Fire risk at the proposed BRC is low due to the nature of the waste proposed for acceptance. Waste containers are removed from site on a regular basis. Recommended separation distances for household hazardous waste will be adhered with to ensure potential ignition sources and flammable materials are not mixed.	Maintain separation distances for household hazardous waste in accordance with EPA guidance.
Dust	Yes	The BRC facility is designed with hardstanding areas for all waste activities and access roads such that dust generation at the facility will be minimal.	DCC will maintain regular cleaning of the facility to reduce potential dust arisings.
Litter	Yes	Facility staff will patrol the facility to ensure that members of the public are correctly using containers and not littering.	Facility staff will regularly clean the waste storage areas, particularly following collection of waste containers.
Birds	Yes	Waste at the facility will be stored in containers and the types of waste likely to attract birds (or other vermin) (i.e. biodegradable waste) will be contained within enclosed containers.	Waste will be removed regularly from site.
Mud	No	Hardstand areas will eliminate the potential for mud to be	

\* indicates required field

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Type of Nuisance	Applicable to the activity? * (Yes/No/ Not Applicable)	Techniques to prevent nuisances *	Where nuisances cannot be prevented, techniques to be used to minimise and reduce nuisances
		deposited across the facility or neighbouring roads.	
Flies	Yes	Waste at the facility will be stored in containers and the types of waste likely to attract flies (or other vermin) (i.e. biodegradable waste) will be contained within enclosed containers.	Waste will be removed regularly from site.
Vermin	Yes	Waste at the facility will be stored in containers and the types of waste likely to attract vermin) (i.e. biodegradable waste) will be contained within enclosed containers. If required, pest control contractors will be engaged to prevent nuisances caused by vermin.	Waste will be removed regularly from site.
Other			

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

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

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## Authorisation Application Form

### 9.3. Environmental Management System (EMS)

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

No

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

No

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

N/A

State the standard of accreditation achieved:

DCC Environmental Management System driven by National Policies and Initiatives.

### Energy Efficiency

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

Energy consumed at the BRC facility will be from compaction equipment and the facility office. A Design Strategy Including Energy for the overall depot was prepared by EDC and submitted with the planning application. This document was primarily prepared for the new DCC office accommodation at the site which is not included within this Waste Licence Boundary.

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

No

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

DCC's (as well as the other three Dublin local authorities) energy management systems are enhanced by CODEMA who support the local authorities in their sustainable energy use.

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

Not Applicable

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

Not Applicable

State the standard of accreditation achieved:

Not Applicable

\* indicates required field

## Authorisation Application Form

### 9.4. Hours of Operation

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

- (a) Proposed hours of operation. – 09:00 to 17:00 (Monday to Wednesday), 09:00 to 18:00 (Thursday to Friday) and 09:00 to 16:00 (Saturdays and Bank Holidays)
- (b) Proposed hours of construction and development works and timeframes. – Construction activities will take place between 08:00 and 17:00 from Monday to Friday, 08:00 and 13:00 on Saturdays. Construction activities are anticipated to continue for about 18 months.
- (c) For waste activities, the proposed hours of waste acceptance. – 09:00 to 17:00 (Monday to Wednesday), 09:00 to 18:00 (Thursday to Friday) and 09:00 to 16:00 (Saturdays and Bank Holidays)
- (d) Any other relevant hours of operation expected (e.g., waste handling, etc.). Not Applicable.

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### 9.5. Review of a Licence

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

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

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

Condition/ Schedule No.	Existing Condition	OEE Agreement Reference	Description

\*add rows to the table as necessary

### 9.6 Environmental Management Techniques – Upload Files

State the number of 'upload files' referred to and named in this attachment document? \*

\* indicates required field