Attachment-9-3-ELRA CRAMP Requirements

As discussed with Ms. Caitríona Collins, on 19 February 2019, it is not proposed to prepare an Environmental Liabilities Risk Assessment (ELRA) or Closure, Restoration and Aftercare Management Plan (CRAMP) as part of the Waste Licence Application for the Ballymun Recycling Centre.

It is acknowledged that there is a requirement in EU and Irish Law for financial provision for certain activities, including the following:

- All haz waste transfer stations; and
- Non-haz waste transfer stations (accepting >50,000 tonnes/annum).

It is considered that the proposed BRC facility does not constitute a hazardous waste transfer station in the context intended above, such as facilities for the handling or processing of waste oils, contaminated soils or facilities dedicated to hazardous waste management. The BRC facility will accept <50 tonnes/annum of household hazardous waste.

In addition, the BRC is proposed to accept <25,000 tonnes/annum of waste (including both hazardous and non-hazardous waste).

As such, it is considered that the potential risk to the environment from an incident at the site is low. The type of waste to be accepted at the facility, the nature of the hardstanding areas where waste handling will take place, the sealed containers within which waste will be contained and the distance from the site to receiving water bodies all contribute to this low risk of environmental pollution. Further, the likelihood of a sudden site closure is very low due to the stable nature of the licensee (Dublin City Council) as a public body.

On the basis of the above, it is considered that an ELRA or CRAMP, and associated financial provision, is not required for the BRC facility.

In the event of permanent cessation of activities at the facility, no more waste materials will be accepted to the facility and all waste stored within skips and containers will be removed from site by authorised waste contractors. The surface water and foul water drainage network will be cleaned, and residues removed from drainage channels, screens and interceptors. Upon completion of the above activities, there will be no materials remaining at the facility with the potential for environmental pollution.