

Attachment-4-8-2-Screeningfor-Baseline-Assessment

Sub Section 4.8 Application ID LA003577

Consent of collying to owner to **Dublin Waste to Energy Limited**

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Quality information

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Prepared for: Dublin Waste to Energy Limited
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1. Introduction

1.1 Project Background

Dublin Waste to Energy Ltd. (DWtE) operate a site located on the Poolbeg Peninsula, Ringsend, Dublin (the site) under Industrial Emissions Licence (IEL) W0232-01 granted by the Environmental Protection Agency (EPA). A proposed increase in the permitted maximum annual quantity of waste accepted at the facility from 600,000 tonnes per annum to 690,000 tonnes per annum (15% increase) has obliged the site to apply to the EPA for a review to the site IEL. As part of the IEL review application, DWtE must identify if a baseline report is required. DWtE appointed AECOM Ireland Limited (AECOM) to assist in the preparation of their IEL review application including the production of this Baseline Assessment.

The site location map and site layouts used to support the IEL application are presented in **Drawing 001** and **Drawing 002** of this IEL review application.

Details on DWtE activities and supporting infrastructure are presented in Attachment 4.8.1: Operational Report that supports the IEL application.

1.2 Baseline Assessment

When the European Union Directive on Industrial Emissions 1 came into force, it became necessary for licensees to prepare a baseline report with regard to soil and groundwater contamination when activity on the site involves the use, production or release of relevant hazardous substances, under either of the following scenarios:

- When applying for an IEL to operate a new installation; and,
- When revising the permit for an existing leensed installation.

Under the Industrial Emissions Directive, a Relevant Hazardous Substance is a raw material, product, intermediary, by-product, emission or waste which, as a result of hazardousness, mobility, persistence and biodegradability (as well as other characteristics), is capable of contaminating soil or groundwater.

1.3 Project Objective

The main objective of this report is to investigate if a baseline assessment is required for the site in support of the current licence amendment application and related to activities on site requiring an IEL.

1.4 Scope of Work

The aim of baseline assessment is to generate a report which, on cessation of the licensed activity, will allow for direct comparison to determine if contamination has been added in the course of the licensed activity since the baseline was established. Therefore, the baseline report needs to be as comprehensive as possible.

The Official Journal of the European Union has issued guidance² on the stages to be completed and the scope of content for baseline reports. In total there are eight stages to be completed, as listed below:

- Stage 1 Identification of hazardous substances used;
- Stage 2 Identification of relevant hazardous substances used;

¹ Industrial Emissions Directive, Directive 2010/75/EU

² European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions (2014)

- Stage 3 Assessment of the site-specific pollution possibility;
- Stage 4 Site history;
- Stage 5 Environmental setting;
- Stage 6 Site characterisation;
- Stage 7 Site investigation; and,
- Stage 8 Production of the baseline report.

The guidance states that:

Where during stages 1-3 it is demonstrated on the basis of the available information that a baseline report is not required, there is no need to progress to the later stages. A record of such a demonstration should be made and held by the competent authority, including the reasons for such a decision.

2. Identification of Hazardous Substances (Stage 1)

The first stage in preparing a baseline assessment is to identify every hazardous substance that is used, produced or released at the site.

Substances were classified as hazardous if:

- They were identified as 'Hazardous' by the EPA in the document Classification of Hazardous and Non- Hazardous Substances in Groundwater (2010); or,
- If they have a relevant hazard statement on the European Chemicals Agency website⁴. A total of 13 relevant environmental hazard statements have been identified:
 - H340 May cause genetic defects
 - H341 Suspected of causing genetic defects
 - H350 May cause cancer
 - H351 Suspected of causing cancer
 - H360D May damage unborn child
 - H360F May damage fertility
 - H400 Very toxic to aquatic life
 - H401 Toxic to aquatic life
 - H402 Harmful to aquatic life
 - H410 Very toxic to aquatic life with long lasting effects
 - H411 Toxic to aquatic life with long lasting effects
 - H412 Harmful to aquatic life with long lasting effects
 - H413 May cause long lasting harmful effects to aquatic life

A list of the hazardous substances identified in Stage 1 are listed in Appendix A, Table 1.

³ http://www.epa.ie/pubs/reports/water/ground/classificationofhazardousandnon-hazardoussubstancesingroundwater.html

⁴ http://echa.europa.eu/

3. Identification of Relevant Hazardous Substances (Stage 2)

Stage 2 screens the hazardous substances identified following Stage 1 for potential pollution risk due to their chemical or physical properties.

This risk-based assessment screens the list of substances given in Appendix A Table 1 in consideration of:

- The physical state of substances that are used and stored on site, e.g. solids and gases can be removed from the list as part of the screening process as their physical state means that are unlikely to result in contamination; and,
- The overall quantity used on site. The EU Guidance states that:

where very small quantities are used, produced or released on the site of the installation then the possibility of contamination is likely to be insignificant for the purpose of producing a baseline report.

An annual usage of >250 L (or >250 kg) was the threshold above which substances used on site were considered in this assessment. Those substances that are used/stored in small quantities on site have not been considered, for example substances used in laboratories or in the canteen.

Three relevant hazardous substances were identified following Stage 2 screening:

- Ammonia solution;
- Diesel; and
- Sodium Hypochlorite.

monia solution; sel; and ium Hypochlorite. Assessment of Site Specific Pollution Possibility (Stage 3)

In Stage 3, the hazardous substances taken forward from Stage 2 were considered in the context of the site to determine whether circumstances exist which may result in the release of a substance in sufficient quantities to pose a pollution risk. Specific issues include:

- The quantity of each hazardous substance or groups of similar hazardous substances;
- How and where hazardous substances are stored and used on site:
- How the hazardous substances are transported around the installation; and,
- In case of existing installations, the measures that have been adopted to ensure that it is impossible in practice for contamination of soil or groundwater to take place (including the presence and integrity of containment mechanisms, condition of site drainage etc.).

For the list of three on-site relevant hazardous substances which were not screened out in Stage 2. AECOM assessed the storage arrangement of each substance together with handling procedures.

At DWtE, the storage and handling of process materials are undertaken in accordance with the EPA Guidance Document IPC Guidance Note on Storage and Transfer of Materials for Scheduled Activities, EPA 2004⁵. Details on the site containment systems were obtained from the Major Accident Hazard Assessment prepared by Elsam⁶ and the site's emergency response procedures⁷. Brief

⁵ http://www.epa.ie/pubs/advice/licensee/guidancetostorageandtransferofmaterialsforscheduledactivities.html

⁶ Elsam (2006) Major Accident Hazard Assessment

⁷ DWTE (2018) Emergency Response Procedure for the Dublin Waste to Energy Facility

details of the storage arrangements for the relevant hazardous substances and associated containment measures on site are provided in Appendix A Table 2.

Based on the information provided by DWtE to AECOM, it is expected that, as a result of site storage facilities, containment and handling practices, the likelihood of possible contamination of soils and groundwater from the relevant hazardous substances on site is very low.

4.1 Ammonia Solution

Ammonia solution is a liquid at room temperature and has the potential to contaminate soil and/or groundwater if lost to ground. At the DWtE facility ammonia solution is injected into the boiler to reduce the nitrogen dioxide and nitric oxide (together known as NOx) in the flue gas through selective non-catalytic reduction. Ammonia solution is stored in an above ground storage tank (AST) with a capacity of 60,000 L, which is located in the Product Storage Area within the main process building.

The following ammonia spill mitigation measures have been implemented:

- 1. The ammonia solution tank is double skinned providing secondary containment and fitted with leak detection systems which alarms to the site control room.
- 2. In the event of a loss of tank containment, the isolated main process building drainage system will act as local tertiary containment.
- 3. The ammonia solution tank has been designed to the appropriate engineering standards for ammonia solution storage.
- 4. In the event of a highly unlikely catastrophic failure of a road tanker delivering ammonia the ammonia solution will drain to the site attenuation tank. An overflow valve to the sewage system will be shut-off following activation of the site alarm of by sensors in the attenuation tank preventing ammonia solution from entering the sewerage system.
- 5. Water in the attenuation tank will remain in situruntil monitoring results dictate the correct disposal route.
- 6. The ammonia solution tank, delivery system and supply pipework have all been placed on a rigorous preventative maintenance system. In addition, there are regular visual inspections undertaken of the ammonia solution storage tanks.
- 7. Ammonia solution supply to the site is undertaken in accordance with strict DWtE procedures.

Given the above design and operational mitigation measures and the DWtE documented procedures on material use and storage, the risk of ammonia solution entering soil and/or groundwater is considered very low.

4.2 Diesel

Diesel is a liquid at room temperature and has the potential to contaminate soil and/or groundwater if lost to ground. Diesel is stored in a bunded 100,000 L capacity tank in the Product Storage Area within the main process building. The diesel tank is located below ground level in a concrete bund arrangement.

The following diesel spill mitigation measures have been implemented:

- The diesel tank is located within a bund providing secondary containment, which is integrity, tested on a five-year cycle. The bund has been designed for a minimum 110% capacity of the diesel tank volume.
- 2. A leak detection system installed in the diesel bund will alert site operators in the event of a loss of containment. An overfill protection alarm has been fitted to the diesel tank.
- 3. The diesel tank and bund have been designed to the appropriate engineering standards for diesel storage.
- 4. The diesel loading point and the points of use (auxiliary burner system and the emergency generators) are bunded with both secondary and tertiary containment.

- 5. The double-contained above ground diesel supply piping to the generators has been designed to minimise flange connections and has been constructed of high quality, pressure rated non-metal material.
- 6. In the event of a highly unlikely catastrophic failure of a road tanker outside of the bund in the main process building, diesel will enter the surface water drainage system where it will be contained by two 10,000 L Class 1 hydrocarbon interceptors.
- 7. Should the interceptor fail or be overcome in the event of a diesel spill (highly unlikely), or should there be a fire in the area, the contaminated liquid will drain to the attenuation tank. An overflow valve to the sewage system will be shut-off following activation of the site alarm or by sensors in the attenuation tank preventing diesel from entering the sewerage system.
- 8. Water in the attenuation tank will remain in situ until monitoring results dictate the correct disposal route.
- The diesel tank, delivery system, supply pipework and the generators have all been placed on a rigorous preventative maintenance system. In addition, there are regular visual inspections undertaken of diesel storage.
- 10. Diesel supply to the site is undertaken in accordance with strict DWtE procedures.

Given the above design and operational mitigation measures and the DWtE have documented procedures on material use and storage, the risk of diesel entering soil and/or groundwater is considered very low.

4.3 Sodium Hypochlorite

Sodium hypochlorite is a liquid at ambient temperature and stored in a bunded 45,000 L capacity AST located in the Product Storage Area. Sodium hypochlorite is used on site as a biocide to treat cooling water. A dosing pump is used to treat the cooling water.

The following sodium hypochlorite spill mitigation measures have been implemented:

- 1. The sodium hypochlorite tank is double skinned providing secondary containment, which is integrity tested on a five-year cycle.
- 2. In the event of a loss of containment and bund failure, the sodium hypochlorite will enter the surface water drainage systemand will drain to the attenuation pond, which will act as local tertiary containment.
- 3. The sodium hypochlorite tank has been designed and certified to the appropriate engineering standards for sodium hypochlorite storage.
- 4. An overflow valve to the sewage system will be shut-off following activation of the site alarm or by sensors in the attenuation tank preventing sodium hypochlorite from entering the sewerage system.
- 5. Water in the attenuation tank will remain in situ until monitoring results dictate the correct disposal route.
- 6. A sodium hypochlorite dosing plan is submitted to the EPA for review as part of the EMP.
- 7. The sodium hypochlorite tank, delivery system, supply pipework and the dosing pumps have all been placed on a rigorous preventative maintenance system.
- 8. Sodium hypochlorite supply to the site is undertaken in accordance with strict DWtE procedures.

Due to the provision of secondary and tertiary containment the risk of sodium hypochlorite entering soil and/or groundwater is considered very low and has been screened out as a Relevant Hazardous Substance.

5. Conclusion

As all of the hazardous substances identified in Stages 1 and 2 were screened out in Stage 3 as a result of the appropriately engineered on-site storage facilities and rigorous handling procedures, a baseline report is not required.

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Appendix A Stage 1 and 2 Screening Tables

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Ammonia solution (25%) Diesel Sodium Hypochlorite FGT-residues, ash and boiler ash Lead di() P-Metalaminophenol Sulfate REAC Ammonia Molybdate Shell Gadus S2 V100 2 Zinc nam triazole di Shell Gadus S2 V100 3 Zinc nam Shell Gadus S2 V100 3 Zinc nam Shell Gadus S2 V100 3 Zinc nam CAT® DEO-ULS 10W-30 (20 L) tetrapropeny zinc alkyl dithiopi CAT® TDTO 30 tetrapropeny zinc alkyl dithiopi CAT® TDTO 30 tetrapropeny zinc alkyl dithiopi CAT® HYDO ADVANCED 10 ates, heavy C18-50 - Branched, cytopic alkyl dithiopi SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H bisphenol-A-Girichino LUI siliates (petroleum), hydrotreated lip GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY WELD ON 719 PVC-U WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreatee	phenol ophate lic and l	7664-41-7 68334-30-5 7681-52-9 Mixture 301-04-2 55-55-0 12054-85-2 Mixture 12001-85-3 91273-04-0 Mixture 12001-85-3 Mixture 12001-85-3 Mixture 121158-58-5 113706-15-3 Mixture 121158-58-5 113706-15-3 Mixture 121158-58-5 113706-15-3 Mixture 12848301-69-9 68649-42-3 Mixture Mixture	EPA Classification Non-Hazardous Hazardous Non-Hazardous	Relevant Hazard Statement H400 H411 H400 - H360F, H400, H410 H400, H410 H400, H410 H410 H400, H410 H400, H410 H400, H410 H400, H410 H401, H411 H60F, H400, H410 H401, H411 H400, H410 H401, H411	Hazardous Substance Yes Yes Yes Yes Yes Yes Yes Y	Quantity >250 L / 250 kg Yes Yes No Yes No No No No No No No	Physical State Stored On-Site Liquid Liquid Liquid Solid Solid Solid Solid Solid Solid Liquid Solid Solid Solid Solid Solid	Amount Stored (approximate) 60,000 100,000 45,000 700,000 <250 <250 <250 <250 <250 <250 <250	Unit L L kg kg kg kg kg L L	Considered a Relevant Hazardous Substance Yes - Relevant Hazard Statement (H400) Yes - Relevant Hazard Statement (H411) Yes - Relevant Hazard Statement (H411) Yes - Relevant Hazard Statement (H400) No - Material is a solid No - Countity below 250 L / 250 kg	
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triazole di Shell Gadus S2 V100 3 Zinc nam Shell Gadus S2 V3 V220C 2 Zinc napr CAT® DEO-ULS 10W-30 (20 L) tetrapropeny zinc alkyl dithiopl CAT® TDTO 30 tetrapropeny zinc alkyl dithiopl CAT® HYDO ADVANCED 10 attes, heavy C18-50 - Branched, oy zinc alkyl dithiopl CAT® HYDO ADVANCED 10 attes, heavy C18-50 - Branched, oy zinc alkyldithiop SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H bisphenol-A-(epi CHESTERTON 785 PARTING LU sillates (petroleum), hydrotreated lip GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY WELD ON 725 WET 'R DRY WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreated	phenol ophate phenol ophate phenol ophate phenol ophate phenol ophate	91273-04-0 Mixture 12001-85-3 Mixture 12001-85-3 Mixture 121158-58-5 113706-15-3 Mixture 121158-58-5 113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture		H410 H400, H410 H400, H410 H60F, H400, H410 H401, H411 H60F, H400, H410 H401, H411	Yes Yes Yes Yes	No No No	Solid Solid Liquid	<250 <250 <250	kg kg	No - Material is a solid No - Material is a solid No - Quantity below 250 L / 250 kg No - Quantity below	
Shell Gadus S2 V100 3	phenol ophate phenol ophate phenol ophate phenol ophate	Mixture 12001-85-3 Mixture 12001-85-3 Mixture 121058-58-5 113706-15-3 Mixture 121158-58-5 113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture		H400, H410 H400, H410 H60F, H400, H410 H60F, H400, H411 H60F, H400, H411 H401, H411	Yes Yes	No No	Solid Liquid	<250 <250	kg L	No - Material is a solid No - Quantity below 250 L / 250 kg No - Quantity below	
zinc nam Shell Gadus S2 V3 V20C2 2 Zinc naph CAT® DEO-ULS 10W-30 (20 L) Lettrapropeny zinc alkyl dithiopl CAT® TDTO 30 tetrapropeny zinc alkyl dithiopl CAT® TDTO 30 tetrapropeny zinc alkyl dithiopl CAT® TDTO 30 tetrapropeny zinc alkyl dithiopl CAT® HYDO ADVANCED 10 ates, heavy C18-50 - Branched, cyt zinc alkyldithiop SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H DISPHONION SYRINGE H DESTERTON 785 PARTING LUI stillates (petroleum), hydrotreated lis GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyt WELD ON P-70 PRIMER Letrahyt WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(apichlorhydrin) epc RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreated Naphtha (petroleum), hydrotreated Naphtha (petroleum), hydrotreate	phenol ophate phenol ophate	12001-85-3 Mixture 12001-85-3 Mixture 121158-58-5 113706-15-3 Mixture 121158-58-5 113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture	-	H400, H410 H60F, H400, H410 H401, H411 H60F, H400, H410 H401, H411	Yes Yes	No No	Solid Liquid	<250 <250	kg L	No - Material is a solid No - Quantity below 250 L / 250 kg No - Quantity below	
Shell Gadus S2 V3 V220C 2 Zinc naph CAT® DEO-ULS 10W-30 (20 L)	phenol ophate phenol ophate	Mixture 12001-85-3 Mixture 121158-58-5 113706-15-3 Mixture 121158-58-5 113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture	-	H400, H410 H60F, H400, H410 H401, H411 H60F, H400, H410 H401, H411	Yes Yes	No No	Liquid	<250	L	No - Quantity below 250 L / 250 kg No - Quantity below	
Zinc naph CAT® DEO-ULS 10W-30 (20 L) tetrapropeny zinc alkyl dithiopl CAT® TDTO 30 tetrapropeny zinc alkyl dithiopl CAT® TDTO 30 tetrapropeny zinc alkyl dithiopl CAT® HYDO ADVANCED 10 ates, heavy C18-50 - Branched, cy zinc alkyldithiop SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H bisphenol-A-(epic CHESTERTON 785 PARTING LU sitiates (petroleum), hydrotreated lip GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyc WELD ON P-70 PRIMER Retrahyc WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreatee Naphtha (petroleum), hydrotreatee Naphtha (petroleum), hydrotreatee	phenol ophate phenol ophate	12001-85-3 Mixture 121158-58-5 113706-15-3 Mixture 121158-58-5 113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture	-	H60F, H400, H410 H401, H411 H60F, H400, H410 H401, H411 H400, H410	Yes Yes	No No	Liquid	<250	L	No - Quantity below 250 L / 250 kg No - Quantity below	
CAT® DEO-ULS 10W-30 (20 L) tetrapropeny zinc alkyl dithiopi CAT® TDTO 30 tetrapropeny zinc alkyl dithiopi CAT® TDTO 30 tetrapropeny zinc alkyl dithiopi attes, heavy C18-50 - Branched, cy zinc alkyl dithiopi sizes, heavy C18-50 - Branched, cy zinc alkyldithiopi sizes, heavy C18-50 - Branched, cy zinc alkyldithiopi sizes, heavy C18-50 - Branched, cy zinc alkyldithiopi sizes, heavy C18-50 - Branched, cy sizes, heavy C18-50 - Branched, cy sizes, heavy C18-50 - Ally Sizes, heavy sizes, heavy sizes, heavy sizes, heavy tetrahyd wello ON 725 WET 'R DRY tetrahyd wello ON 719 PVC-U WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	phenol ophate phenol ophate	Mixture 121158-58-5 113706-15-3 Mixture 121158-58-5 113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture	-	H60F, H400, H410 H401, H411 H60F, H400, H410 H401, H411 H400, H410	Yes Yes	No No	Liquid	<250	L	No - Quantity below 250 L / 250 kg No - Quantity below	
tetrapropeny zinc alkyl dithiopl CAT® TDTO 30 tetrapropeny zinc alkyl dithiopl ZAT® HYDO ADVANCED 10 ates, heavy C18-50 - Branched, cyc zinc alkyldithiopl SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H bisphenoi-A-(epi CHESTERTON 785 PARTING LU sitiates (petroleum), hydrotreated lip ELEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY WELD ON P-70 PRIMER tetrahyc WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenoi-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreated Naphtha (petroleum), hydrotreated Naphtha (petroleum), hydrotreated	phenol ophate	121158-58-5 113706-15-3 Mixture 121158-58-5 113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture	-	H401, H411 H60F, H400, H410 H401, H411 H400, H410	Yes	No	Liquid			250 L / 250 kg No - Quantity below	
zinc alkyl dithiopl CAT® TDTO 30 tetrapropeny zinc alkyl dithiopl CAT® HYDO ADVANCED 10 ales, heavy C18-50 - Branched, cyt zinc alkyldithiop SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H bisphenol-A-(epic CHESTERTON 785 PARTING LU stilates (petroleum), hydrotreated lip GLETIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyt WELD ON P-70 PRIMER WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreatee	phenol ophate	113706-15-3 Mixture 121158-58-5 113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture	-	H401, H411 H60F, H400, H410 H401, H411 H400, H410	Yes	No	Liquid			250 L / 250 kg No - Quantity below	
CAT® TDTO 30 tetrapropeny zinc alkyl dithiopl CAT® HYDO ADVANCED 10 ates, heavy C18-50 - Branched, cyclinc alkyldithiopl SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H bisphenol-A-(epic CHESTERTON 785 PARTING LUI stilates (petroleum), hydrotreated light GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyd WELD ON 725 WET R DRY tetrahyd WELD ON 719 PVC-U SIKA SIKADUR - 330 tetrahyd SIKA SIKADUR - 330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreated SIK SIKA (ikitanda 1940 pot 1940 po	phenol ophate lic and l	Mixture 121158-58-5 113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture	-	H60F, H400, H410 H401, H411 H400, H410			ي. Liquid	<250	L	No - Quantity below	
tetrapropeny zinca alkyd itibip CAT® HYDO ADVANCED 10 ates, heavy C18-50 - Branched, cy or calkyd itibip SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H bisphenol-A-(epi CHESTERTON 785 PARTING LU stilates (petroleum), hydrotreated li GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyc WELD ON P-70 PRIMER tetrahyc WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	ophate	121158-58-5 113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture	-	H401, H411 H400, H410			Liquid	<250	L		
zinc alkyl dithiopi Zinc alkyl dithiopi ates, heavy C18-50 - Branched, cy zinc alkyldithiop Zinc alkyldithiop Zinc alkyldithiop SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H LOCTITE 3450 TWIN SYRINGE H Sisphenol-A-(epi Silates (petroleum), hydrotreated lip GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY WELD ON P-70 PRIMER WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	ophate	113706-15-3 Mixture 848301-69-9 68649-42-3 Mixture	-	H401, H411 H400, H410			Liquid	<250	L		
CAT® HYDO ADVANCED 10 ates, heavy C18-50 - Branched, cyv zinc alkyldithiop SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H bisphenol-A-(epi CHESTERTON 785 PARTING LU siliates (petroleum), hydrotreated lip GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyd WELD ON P-70 PRIMER tetrahyd WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreated	lic and I	Mixture 848301-69-9 68649-42-3 Mixture	-	H400, H410	Vos					250 L / 250 kg	
ates, heavy C18-50 - Branched, cyzinc alkyldithlog SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H		848301-69-9 68649-42-3 Mixture			Ves		ν				
zinc alkyldithiop SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H bisphenol-A-(epich CHESTERTON 785 PARTING LUI Sillates (petroleurn), hydrotreated lig GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyt WELD ON P-70 PRIMER WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate		68649-42-3 Mixture								No - Quantity below	
SIMALUBE 24 LOCTITE 3450 TWIN SYRINGE H bisphenol-A-(epi CHESTERTON 785 PARTING LU sillates (petroleum), hydrotreated lip GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyt WELD ON P-70 PRIMER tetrahyt WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	hospha	Mixture	-		100	No other	Liquid	<250	L	250 L / 250 kg	
LOCTITE 3450 TWIN SYRINGE H bisphenol-A-(epi CHESTERTON 785 PARTING LUI siliates (petroleum), hydrotreated lig GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyt WELD ON P-70 PRIMER WELD ON 719 PVC-U LIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate				H401, H411		4 40					
bisphenol-A-(epi CHESTERTON 785 PARTING LU Billates (petroleum), hydrotreated lis Billates (petroleum), hydrotreated lis Billates (petroleum), hydrotreated lis Billates (petroleum), Partin Seize heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyd WELD ON 725 WET 'R DRY tetrahyd WELD ON 719 PVC-U SIKA SIKADUR - 330 bisphenol-A-(epichlorhydrin) epc Napt RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate		Mixture	1	H412	Yes	77. WA	Solid	<250	kg	No - Material is a solid	
CHESTERTON 785 PARTING LU siliates (petroleum), hydrotreated lis GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY WELD ON P-70 PRIMER tetrahyt WELD ON 719 PVC-U WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate			_		Yes (No No	Liquid	<250	L	No - Quantity below	
silates (petroleum), hydrotreated lig GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X WELD ON 725 WET 'R DRY WELD ON P-70 PRIMER WELD ON 719 PVC-U tetrahyd WELD ON 719 PVC-U tetrahyd SIKA SIKADUR - 330 bisphenol-A-(epichlorhydrin) epc Napt RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate		500-033-5	-	H411	ر څری.	100				250 L / 250 kg	
GLEITIMO 165 ANTI SEIZE heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X WELD ON 725 WET 'R DRY WELD ON 725 WET R DRY WELD ON 779 PRIMER tetrahyd WELD ON 719 PVC-U SIKA SIKADUR - 330 bisphenol-A-(epichlorhydrin) epc Napt RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate		Mixture		11444	Yes POSES	N-	Solid	<250	1	No. Material is a solid	
heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY WELD ON P-70 PRIMER tetrahyd WELD ON 719 PVC-U tetrahyd SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Napt RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	nt napn	64742-47-8 64742-49-0	-	H411 H411	Tes Quit	No No	Solid	<250	kg	No - Material is a solid	
heptadecenyl)-2-oxazoline-4,4-dim DENIOS BIO X Orange WELD ON 725 WET 'R DRY WELD ON P-70 PRIMER tetrahyd WELD ON 719 PVC-U tetrahyd SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Napt RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate		Mixture	-	H411	2011						
DENIOS BIO X Orange WELD ON 725 WET 'R DRY tetrahyd WELD ON P-70 PRIMER WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	othanol	28984-69-2		H412	citon Vestees	No	Solid	<250	kg	No - Material is a solid	
Orange WELD ON 725 WET 'R DRY tetrahyd WELD ON P-70 PRIMER tetrahyd WELD ON 719 PVC-U tetrahyd SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Napt RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	Nickel	7440-02-0	Non-Hazardous	H351, H412	CHOT YES IL	140	Solid	\250	Ng	140 - Iviateriai is a solid	
Orange WELD ON 725 WET 'R DRY tetrahyd WELD ON P-70 PRIMER tetrahyd WELD ON 719 PVC-U tetrahyd SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Napt RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	THICKCI	Mixture	INOIT-Hazardous	11001,11412	Cr 200					No - Quantity below	
WELD ON 725 WET 'R DRY tetrahyc WELD ON P-70 PRIMER tetrahyc WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	ernene	8028-48-6	-	H411, H410	Yes	No	Liquid	<250	L	250 L / 250 kg	
tetrahyd WELD ON P-70 PRIMER tetrahyd WELD ON 719 PVC-U tetrahyd SIKA SIKADUR - 330 bisphenol-A-(epichlorhydrin) epc Napt RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	Стрене	Mixture	-	11411,11410	(A)					No - Quantity below	
WELD ON P-70 PRIMER tetrahys WELD ON 719 PVC-U tetrahys SIKA SIKADUR - 330 bisphenol-A-(epichlorhydrin) epc Napt RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	rofuran	109-99-9	_	H350 (1)	Yes	No	Liquid	<250	L	250 L / 250 kg	
tetrahyd WELD ON 719 PVC-U SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	ioiaiaii	Mixture	-	1						No - Quantity below	
WELD ON 719 PVC-U tetrahyo SIKA SIKADUR - 330 bisphenol-A-(epichlorhydrin) epc Napr RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	rofuran	109-99-9	_	H350	Yes	No	Liquid	<250	L	250 L / 250 kg	
tetrahyd SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate				0						No - Quantity below	
SIKA SIKADUR -330 bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	tetrahydrofuran		_	H351	Yes	No	Liquid	<250	L	250 L / 250 kg	
bisphenol-A-(epichlorhydrin) epc Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate				NIOO I							
Naph RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate			-	H411	Yes	No	Liquid	<250	L	No - Quantity below	
RAID FLY & WASP KILLER Naphtha (petroleum), hydrotreate	Naphthalene		Hazardous C	H351, H410						250 L / 250 kg	
	heavy	64742-48-9	-	H350		No	Liquid	<250	L	No - Quantity below	
1R-trans pho		26046-85-5	-	H400, H410						250 L / 250 kg	
	llethrin	23031-36-9	-	H410			İ			/ ===g	
Specialised Aerosols Zinc-Rich Mixture											
	Xylene	1330-20-7	Hazardous	-	Yes	No	Liquid	<250	L	No - Quantity below	
		Non-Hazardous	H410						250 L / 250 kg		
Specialised Aerosols Wire Rope Spray Mixture						No Out to Lit					
(Low Boiling Point Hydrogen		64742-49-0	-	H340, H350 Yes		No Liquid	<250	L	No - Quantity below		
		64742-52-5	-	H350						250 L / 250 kg	
Rocol Dry Moly Mixture											
Hydrocarbon Aerosol Pr		68476-85-7	-	H340, H350		N- C-lid	250	No Motorial is a selled			
		64742-49-0	-	H340, H350	Yes	No	Solid	<250	kg	No - Material is a solid	
	pecified pellant	1330-20-7	Hazardous	-							
Hansil Silicone	pecified pellant	Mixture									
Middle Petroleum D	pecified pellant reated	265-184-2			Yes	No	Solid	<250	kg	No - Material is a solid	
Light Aliphatic Hydro	pecified pellant reated Xylene								-		
Hycote Spray Paint	pecified pellant reated Xylene stillates	4742-47-8	1		V	N.	13- 11	050		No - Quantity below	
	pecified pellant reated Xylene stillates		1		Yes	No	Liquid	<250	L	250 L / 250 kg	

	Stage 3						
Material / Substance	Storage Location	Transportation Method	Containment Measures	Likelihood of Release to Open Ground	To be Monitored - Rationale		
Ammonia solution (25%)	Double skinned 60,000 L above ground storage tanks located in the main process building	Stored local to use All pipework and points of use located within bund Refilled by road tanker	Tank and all flanges and valves located in bunds The main process building's isolated drainage system provides tertiary containment Tanks refilled by tanker within tertiary bund In the event of a spill outside of the building, ammonia solution will enter the surface water drainage system where it will be contained within the attenuation tank Water in the attenuation tank is retained on site for reuse, excess water is transferred to the sewage system following testing to ensure it is within IEL parameters Connection to the sewerage system can is also closed if the alarm is activated	Highly Unlikely	No adequately bunded, with local secondary and tertiary containment and suitable procedures in the event of a large scale loss		
Diesel	Bunded 100,000 L storage tank located in the main process building	Stored local to use All pipework and points of use located within bund Refilled by road tanker	Tank and all flanges and valves located in bunds The bunds are checked visually daily and integrity tested every five years Tanks refilled by tanker within bunded area Fill protection alarms fitted to diesel tank. Leak protection systems located in diesel bund In the event of a spill outside of the building, diesel will enter the surface water drainage system where it will be contained by a Class 1 oil-water separator, if the separator tails it will be contained within the attenuation tank Water in the attenuation tank is retained on site for reuse, excess water is transferred to the sewage system following testing to ensure it is within IEL parameters Connection to the sewerage system can is also closed if the alarm is activated	Highly Unlikely	No adequately bunded, with local containment and a leak detection system. Suitable procedures in the event of a large scale loss		
Sodium Hypochlorite	Bunded 45,000 L above ground storage tank	Stored local to use Transfer to point of use through above ground pipework Refilled by road tanker	Tank and all flanges and valves located in bunds The bunds are checked visually daily and integrity tested every five years Sodium hypochlorite lost from the tank and bund will enter the surface water drainage system where it will be contained by the attenuation tank providing tertiary containment Water in the attenuation tank is retained on site for reuse, excess water is transferred to the sewage system following testing to ensure it is within IEL parameters Connection to the sewerage system can is also closed if the alarm is activated	Highly Unlikely	No adequately bunded, with local secondary and tertiary containment and suitable procedures in the event of a large scale loss		

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