EPA Application Form

9.1 - Environmental Management Techniques - Attachment

Organisation Name: *	Dublin Waste to Energy Limited
Application I.D.: *	LA003577

* indicates required field

Amendments to this Application Form Attachment

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

9 Environmental Management Techniques [1]

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.

[1] 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.

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)[2].

Measure *	Surveillance Measures		
	Description *	Frequency of Surveillance *	Method / Standard *
DWtE Emergency Response Plan (ERP)	The Emergency Response Plan (ERP) details the initial response to an environmental, health or safety related incident on site, for example a fire, chemical spillage or extreme weather event. The ERP describes the procedures for handling emergencies on the DWtE site and ensures environmental risks are contained to minimise any adverse impacts on the environment. Plant, processes and materials have been examined, through a process of risk assessment, and areas that may give rise to safety or environmental emergencies have been identified. Risk Assessments are conducted for the site and the ERP updated accordingly.	The emergency response system is tested by conducting evacuation drills and incident simulations. The ERP has been submitted to the EPA is reviewed annually as per condition 9.2 of the existing site IE Licence and/or after the occurrence of accidents or an emergency situation.	The Director of Operations holds overall responsibility for the facility during normal operations and in an emergency. The Director of Operations is also responsible for the state-of-readiness of the plant, emergency equipment and for ensuring required training is conducted. For an emergency event that occurs during normal business hours the Director of Operations or his designee will act as the Emergency Coordinator (EC) and is responsible and shall be in charge of the situation.
DWtE Accident Prevention Policy (APP)	The DWtE APP describes the systems in place for the prevention and control of environmental accidents/incidents which could arise on site.	The APP is reviewed and revised as	The Director of Operations holds overall responsibility for the APP.

[2] Information relating to the integrity, impermeability and recent testing or pipes, tanks and bund areas should be included.

* indicates required field

Measure *	Surveillance Measures		
	Description *	Frequency of Surveillance *	Method / Standard *
	Environmental accident/incident prevention is embedded at the DWtE site by: • Techniques to recognize hazards and to execute abatement, including accident investigations, near-miss evaluations, and Facility audits; • Procedures for documentation and analysis of accidents, including accident and near-miss reporting; and • Procedures for communicating health and safety issues to employees through training, weekly safety meetings, the monthly safety theme, "Safety Alerts," and the Facility safety committee. The APP acts as an overarching Policy with respect to the various on-site mechanisms and procedures and should be read in conjunction with the ERP in the first instance and the relevant Standard Operating Procedures (SOPs). Measures outlined in the APP such as, site design, site drainage, firewater run-off management and operational controls are described in detail in the Environmental Liabilities Risk Assessment (ELRA) previously submitted to the EPA.	necessary as per condition 9.1 of the existing site IE Licence.	
Risk Identification	DWtE have undertaken a risk assessment in accordance with the requirements of the 2014 EPA guidance on assessing and costing environmental liabilities. A number of potential risks were	Risk assessment carried out every 3 years.	As per associated site procedure.

Measure *	Surveillance Measures		
	Description *	Frequency of Surveillance *	Method / Standard *
	identified and then assessed in terms of their likelihood and consequence. A consequence (C) and likelihood (L) rating was assigned to each risk and a risk score generated based on the product of the two ratings (i.e. C x L). This risk score allows the identified risks to be ranked to assist in prioritisation for a risk treatment process.		
DWtE Spill & Leak Response Plan	The DWtE facility has been designed to reduce the environmental impact of the company's operations during normal, abnormal or emergency situations. The facility consists of one main process building within which all process activities take place. The process building has two identical waste-to-energy lines, each with separate boilers and flue gas cleaning. The drainage system consists of internal surface water drainage, external rain water drainage and foul water drainage. Rain water falling on roads and hardstanding surfaces discharges into an attenuation tank located at the northern end of the site via two full retention Class 1 oil/water interceptors. Roof water discharges directly to the attenuation tank. Roof water and road water is re-used as process water (pumped from the attenuation tank). Flows in excess of quantities that can be reused as process water are discharged to the adjacent Ringsend MWwTP. Storage tanks are all bunded and loading	Spill & Leak response reviewed every three years.	As per associated site procedure.

Measure *	Surveillance Measures		
	Description *	Frequency of Surveillance *	Method / Standard *
	/unloading operations are carried out in accordance with a documented SOP. The response to a spill also includes the recording of the spill as an incident and the investigation and corrective action process to minimise a spill incident reoccurring.		
Environmental Liability Risk Assessment (ELRA)	The ELRA was prepared to satisfy condition 12.2.1 of the IE licence and to accurately reflect the risks of unplanned but plausible incidents occurring including abnormal operating conditions.	The ELRA is reviewed as necessary to reflect any significant change on site, and in any case every three years following initial agreement.	The methodology for the development of the ELRA follows the EPA Guidance Document; Guidance on Assessing and Costing Environmental Liabilities (EPA 2014).

*add rows to the table as necessary

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): *

As outlined in DWtE's ERP for an emergency event that occurs during normal business hours the Director of Operations or his designee will act as the Emergency Coordinator (EC) and is responsible and shall be in charge of the situation. For an emergency event that occurs during the evening shift, night shift or weekends, the Shift Supervisor is in charge until the Director of Operations or his designee can be contacted and arrives at the facility.

The general line of succession is as follows;

- Director of Operations
- Operations Manager/Chief Engineer
- Shift Supervisor
- Control Room Operator

It should be noted that the facility operates 24/7, 365 days a year and as such will be staffed at all times.

Soil Monitoring Points

Periodic monitoring of soil and groundwater is required having regard to the possibility of soil and groundwater contamination of the site[3].

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): * No

Soil Monitoring Point Code	Monitoring Point Grid Ref.	
	Easting [4]	Northing [5]
n/a		

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

Soil Monitoring Point Code	Monitoring Point Grid Ref.	
	Easting [4]	Northing [5]

*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
n/a						

*add rows to the table as necessary

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): * Yes

Monitoring Point Code	Monitoring Point Grid Ref.	
	Easting [6]	Northing [7]
GW1	320001	233540

*add rows to the table as necessary

[6] Six Digit GPS Irish National Grid Reference
[7] Six Digit GPS Irish National Grid Reference

* indicates required field

Groundwater Parameters

Complete the table below with summary details of the groundwater parameters. (If different parameters are associated with different monitoring points this should be identified in the table below.)

Parameter	Unit	Trigger Level	How was the trigger level determined?	Proposed Monitoring Frequency	Sample Method	Analysis Method / Technique
Potassium	mg/l	5	Interim Guideline Value	Annually	Purging 3-5 well volumes	Standard method
Ammonia (NH_4)	mg/l	0.175	Groundwater Threshold Value	Annually	Purging 3-5 well volumes	Standard method
pH	pH unit	6.5-9.5	Interim Guideline Value & Groundwater Threshold Value	Annually	Purging 3-5 well volumes	pH electrode/meter
Metals (Cd, Tl, Hg, Pb, Cr, Cu, Mn, Ni, As, Co, V, Sn) and their compounds	µg/L	Various	The lower of: Groundwater Threshold Value or Interim Guideline Value, if defined	Annually	Purging 3-5 well volumes	Standard method
Organohalogens (screening for priority pollutant list substances (such as US EPA volatile and/or semi-volatile compounds))	µg/L	Various	The lower of: Groundwater Threshold Value or Interim Guideline Value, if defined	Annually	Purging 3-5 well volumes	GC-MS

*add rows to the table as necessary

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[8] as part of the licence, or licence review application.

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

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: As previously agreed with the Agency

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:

As previously agreed with the Agency

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: As previously agreed with the Agency

[8] 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 16th 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.

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[9]. 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: As previously agreed with the Agency.

Costed CRAMP

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

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

[9] 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 16th 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.

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?	As previously agreed with the Agency

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:	As previously agreed with the Agency

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).

n/a

Emergency Response Procedure

Do you have an emergency response procedure (ERP)? (Yes/No) *	Yes
Is the ERP compliant with the EPA guidance? (Yes/No) *	Yes

* indicates required field

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	n/a	A negative air system is installed at the DWtE facility. The air from the tipping floor and the waste bunker areas is drawn into the combustion chamber via the primary air system therefore minimising odours from the plant. All waste storage takes place indoors. The single access door can also be closed when required. There are no fugitive odour emissions from the facility.	n/a
Fire Control	Yes	Comprehensive fire suppression system at the facility.	n/a
Dust	n/a	The DWtE facility operates under the containment principle. All operations take place inside the building. The tipping floor areas and waste bunker areas are under negative air system to prevent dust escaping from the facility. Instead these emissions drawn into the primary air feed to the furnace where the combustion of waste takes place. No fugitive dust emissions are emitted from the facility.	n/a
Litter	n/a	All waste arrives at the DWtE facility in covered vehicles and is tipped directly into the waste bunker. All drivers ensure that vehicles are clean before leaving the tipping floor to ensure no litter is brought out onto the roadways. A weekly environmental walk down of the facility and its environs ensures that littering is prevented.	n/a
Birds	n/a	DWtE has engaged the services of a vector control contractor to mitigate the presence of vectors. Site audits take place by	n/a

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
		the contractor on a weekly basis or more frequent as required and subsequent control measures are enacted to mitigate against vectors. Audit reports provided by the contractor are filed on site with the Environmental Manager. No fugitive vector emissions are emitted from the facility.	
Mud	n/a	There is no mud derived from the DWtE facility as the waste vehicles entering the facility have arrived from the public roadway and onto the tipping floor area. The waste is tipped into the waste storage bunker and therefore does not make contact with the wheels of the vehicle thus ensuring the waste is not brought onto the public roads. Dublin Waste to Energy use a road sweeper to maintain the facility roadways and tipping floor hall in good condition. No fugitive mud emissions are emitted from the facility.	n/a
Flies	n/a	DWtE has engaged the services of a vector control contractor to mitigate the presence of vectors. Site audits take place by the contractor on a weekly basis or more frequent as required and subsequent control measures are enacted to mitigate against vectors. Audit reports provided by the contractor are filed on site with the Environmental Manager. No fugitive vector emissions are emitted from the facility.	n/a
Vermin	n/a	DWtE has engaged the services of a vector control contractor to mitigate the presence of vectors. Site audits take place by the contractor on a weekly basis or more frequent as required and subsequent control measures are enacted to militate against vectors. Audit reports provided by the contractor are filed on site with the Environmental Manager. No fugitive vector emissions are emitted from the facility.	n/a

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
Other	No		

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

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

9.3. Environmental Management System (EMS)

Do you have an environmental management system? (Yes/No) *	Yes
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:	n/a

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. *	An Energy Efficiency Audit of the facility was conducted in July 2018. During this Audit and as required by The European Commission final draft 'Reference Document on the Best Available Techniques (BAT) for Waste Incineration', dated December 2018 benchmarking was undertaken of the DWtE facility against other European Incinerators in terms of its energy performance. The result of this benchmarking was that the DWtE facility was rated above the other facilities in terms of electrical efficiency. Condition 7.2 of the DWtE IE License states: "The licensee shall build and operate the facility to achieve an energy efficiency of, as a minimum, 0.65 using the formula below to calculate Energy Efficiency: Energy Efficiency = [Ep - (Ef + Ei)] / [0.97 x (Ew + Ef)] " During the July 2018 audit an energy efficiency of 71.5% was calculated which is above the 65% efficiency required. When the Dublin District Heating scheme becomes operational the measured overall efficiency of the plant will increase well above the current 71.5% figure. Energy Management was a key consideration during the design and commissioning phase of the DWtE facility. It is continually monitored on a daily basis by plant management. Opportunities for improved efficiency are investigated via the site EMP.
Has an energy audit been carried out? (Yes/No) *	Yes

Do you have an energy efficiency management system? (Yes/No) *	Yes
If 'Yes', is the energy efficiency 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:	n/a

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.

The Facility operates 24 hours a day, seven days a week.

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(b) Proposed hours of construction and development works and timeframes.

Not applicable

(c) For waste activities, the proposed hours of waste acceptance.

Waste deliveries are only accepted Monday to Saturday, 8.00 a.m. to 10.00 p.m. Incinerator residues destined for ships within the Dublin Port Area can be removed from the facility at any time.

(d) Any other relevant hours of operation expected (e.g., waste handling, etc.).

Waste handling/acceptance activities are conducted Monday to Saturday, 8.00 a.m. to 10.00 p.m.

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
Schedule B.1 Emission limits	Schedule B.1	Amendment A	The carbon monoxide periodic value in B.1 Emission Limits to Air is deleted. The notes 4,5,6 and 7 of B.1 Emission Limits to air is also replaced with the new notes in Amendment A.
Condition 4.2.1.4	No temperature value shall exceed the emission limit value by more than 0.5°C.	Amendment B	The Condition 4.2.1.4 of the licence is amended as follows: No temperature value, calculated as an hourly average, shall exceed the emission limit value by more than 0.5°C.
Condition 3.9.2	The licence shall carry out an investigation into the feasibility of the use of an enclosed conveyor system for the transfer of bottom ash to trucks/containers and to any off-site storage area with reference to the EC Reference Document on Best Available Techniques on Emissions from Storage.	LR021983	DWtE completed this feasibility report which was submitted to OEE in April 2016.
Condition 5.7	The licensee shall, prior to the commencement of the waste activity, submit a report to the	LR021128	DWtE completed this feasibility report which was submitted to OEE in February 2016.

* indicates required field

	Agency on the feasibility and reliability of monitoring methods/ techniques to determine the Cr(VI) fraction of the Total Cr, the particle size distribution and particle number of the ultra fine (< PM0.1) fraction of the total dust emission from Emission Point Reference No. A2-1 & A2-2.		
Condition 6.2	The licensee shall carry out a noise survey of the site operations within three months after the commencement of the licensed activity.....	LR029811	DWtE completed an initial noise survey which was submitted to OEE in July 2017.
Condition 6.12	The licensee shall prepare a programme, to the satisfaction of the Agency, for the identification and reduction of fugitive emissions.	LR034640	DWtE completed an assessment of fugitive emissions which was submitted to OEE in April 2018.
Condition 6.16.3	The licensee shall undertake a biological survey of the receiving water upstream and downstream of the cooling water outfall within twelve months of commencement of the waste activity.....	LR034527	DWtE completed a biological survey which was submitted to OEE in April 2018.
Condition 6.17	The licensee shall undertake a thermal survey of the estuary upstream and downstream of the cooling water channel outfall within twelve months of commencement of the activity.....	LR035392	DWtE completed a thermal survey which was submitted to OEE in June 2018.
Condition 7.3	The licensee shall carry out an audit of the energy efficiency of the facility within one year of the date of commencement of waste	LR035989	DWtE completed an energy audit which was submitted to OEE in July 2018.

	acceptance……		
Condition 8.2.3 (a)	Prior to the commencement of waste acceptance at the facility the licences shall establish and maintain, and submit to the Agency for written approval, detailed written procedures for the acceptance and handling of wastes including: (a) Procedures for waste profiling from new and known customers, inspection at the point of entry to the facility and waste characterisation…….	LR027227	DWtE prepared the required waste procedure which was submitted to OEE in February 2017.
Condition 8.2.3 (b)	Prior to the commencement of waste acceptance at the facility the licences shall establish and maintain, and submit to the Agency for written approval, detailed written procedures for the acceptance and handling of wastes including: (b) Methods for the characterisation of waste sent off-site for disposal/recovery…….	LR030120	DWtE prepared the required waste procedure which was submitted to OEE in July 2017.
Condition 8.2.3 (d)	Prior to the commencement of waste acceptance at the facility the licences shall establish and maintain, and submit to the Agency for written approval, detailed written procedures for the acceptance and handling of wastes including: (d) procedures for the handling of waste and incinerator residues including bunker and silo management…….	LR027833	DWtE prepared the required waste procedure which was submitted to OEE in March 2017.

Condition 9.2	The licensee shall, prior to the commencement of waste activities submit a written ERP to the Agency for its agreement	LR033172	DWtE submitted a revised ERP to OEE in January 2018.
Condition 10.2	Decommissioning Management Plan	LR025988	DWtE submitted a revised CRAMP to OEE in November 2016.
Condition 12.2	Financial Provisions for Environmental Liabilities	LR025989	DWtE submitted an ELRA to OEE in November 2016.

*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? * 0