

EPA Application Form

9.1 - Environmental Management Techniques - Attachment

Organisation Name: *

Packaging laundry Limited

Application I.D.: *

LA004392

Authorisation Application Form

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

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9 Environmental Management Techniques¹

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.

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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)².

Measure *	Surveillance Measures		
	Description *	Frequency of Surveillance *	Method / Standard *
Bund Integrity Test	The 5,000L wash water holding tank is regularly inspected for defects and its bund routinely (every three years) integrity tested in accordance with "IPC Guidance Note on Storage and Transfer of Materials for Scheduled Activities (2004) EPA". All other bunds on site (chemical storage area and bund at the Steel Drum cleaning area) are also integrity tested every three years.	Three years	In accordance with IPC Guidance Note on Storage and Transfer of Materials for Scheduled Activities (2004) EPA
Emergency Preparedness and Response Plan	<p>A comprehensive Emergency Preparedness Response Plan is in place which details the measures to respond to various types of emergencies including:</p> <ol style="list-style-type: none"> 1) Fuel, Oil, Chemical Spillages/Flooding 2) Fires or Explosions 3) Electrical Emergencies <p>The plan is reviewed annual (or as required) and updated if necessary.</p>	Reviewed Annually	Ref. No. SOP06
Silt Trap Cleaning and Maintenance	The silt trap and drain mesh located in the external wash area is inspected daily and cleaned as required to prevent solids entering storm water	Daily	Visual inspection and drain mesh cleaned and replaced as necessary.

² 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 *
	drainage system.		
Chemical Storage	There are low volumes of chemicals stored at the facility due to the fact that packaging vessels are cleaned/washed using water only (ie- no solvents, or other cleaning agents are used in the process). The few chemicals stored on site are clearly labelled, stored in designated areas and atop an impervious concrete surface. All chemical SDS are retained on site and an Emergency Preparedness Plan is in place at the facility.	Daily	Not applicable
Training (emergency procedures)	Staff undergo regular training on the company's Emergency Preparedness and Response Plan which includes management of spills at the site.	Annual training	MN01 Packaging Laundry Emergency Manual
Environmental Policy	The company has a robust environmental policy and regards environmental protection as an essential requirement of its operations. This policy is reviewed annually and is communicated to all staff as part of their initial and ongoing training.	Annually	PD 03 Environmental Policy

*add rows to the table as necessary

* indicates required field

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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 facility does not operate outside of opening hours or over the weekend and therefore the risk of any emergency situation or environmental incident due to operations is low. Smoke detectors and fire alarms are installed throughout the business.

Soil Monitoring Points

Periodic monitoring of soil and groundwater is required having regard to the possibility of soil and groundwater contamination of the site³.

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 ⁴	Northing ⁵
none		

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
Not applicable						

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*add rows to the table as necessary

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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 ⁶	Northing ⁷
none		

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*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



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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
Not applicable						

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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 ELRA⁸ 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:

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.

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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 activities⁹. 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 CRAMP⁹ submitted as part of the licence, or licence review application.

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

No

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.



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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?

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).

Activities at the facility involve the refurbishment and reconditioning of packaging containers and as a result minimal machinery, waste or chemicals are used on site. Due to the relatively modest size of operations, in the case of cessation of the business, all equipment can be decommissioned and removed without posing a risk to the receiving environment. The 5,000L wash water holding tank can be emptied via tanker and decommissioned/ removed without posing any long term environmental risk.

Emergency Response Procedure

* indicates required field

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

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

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	No	Odorous materials are not accepted at the facility.	
Fire Control	No	<p>There are no high-risk activities undertaken at the facility which are likely to result in fire. The facility does not operate outside working hours.</p> <p>Fire prevention measures are in place as per best practice, including smoke detectors, fire alarms, fire extinguishers and fire blankets.</p> <p>All staff members undergo fire safety awareness training which is delivered annually.</p>	<p>Fire prevention measures include:</p> <ul style="list-style-type: none"> • smoke detectors • fire alarms • fire extinguishers • fire blankets (in the staff kitchen). • Staff undergo fire safety training
Dust	No	The potential for nuisance dust only occurs during the cutting of IBC bottles. This activity is undertaken at the rear of the enclosed warehouse and any dusts generated are contained within this designated area, which is swept daily. All debris and dust from this process is placed in a plastic bag and put in a bin.	
Litter	No	No general or household wastes are accepted at the facility. General house keeping measures are in place to ensure any litter from the staff canteen or incidental waste from the	

* 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
		warehouse is placed in designated bins and removed.	
Birds	No	Not applicable	
Mud	No	Not applicable	
Flies	No	Not applicable	
Vermin	No	Vermin is not a nuisance at the facility. No general or household wastes are accepted at the site. General good house keeping measures are in place to ensure any litter from the staff canteen is placed in designated bins and removed from site.	
Other	No	Not applicable	

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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9.3. Environmental Management System (EMS)

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

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

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

State the standard of accreditation achieved:

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. *

Equipment used at the facility represents industry best practice for energy efficiency. Equipment is on a preventative maintenance schedule to ensure they operate at maximum efficiency (including reducing noise or air emissions). New technologies are explored when they become available.

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

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

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

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

State the standard of accreditation achieved:

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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. 08:00 - 17:00 (9 hours) Monday to Friday
- (b) Proposed hours of construction and development works and timeframes. Not Applicable
- (c) For waste activities, the proposed hours of waste acceptance. 08:00 - 17:00 (0 hours) Monday to Friday
- (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
Not Applicable			

*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