

Licence Alteration Request

Alteration Details	
Licence	W0247-01 Blackhall Soil Recovery Facility
Licensee	Behan's Land Restoration Limited
Title of Alteration	Amendment of Condition 6.14.3

Screening Report

No.	Question	Answer
1	Does the proposed alteration require a new class of activity or process?	No
2	Does the proposed alteration cause a new / additional main emission point?	No
3	Does the proposed alteration increase or change specified emissions significantly ?	No
4	Does the proposed alteration increase significantly the overall total emission from the installation/facility?	No
5	Does the proposed alteration involve development or proposed development that has already been granted planning permission or requires a grant of planning permission and was/is subject to EIA by the Planning Authority or An Bord Pleanála?	No
6	Did the proposed alteration require the preparation of a Natura Impact Statement (NIS) for consideration by any Planning or Public Authority?	No
7	Does the proposed alteration indicate that the EPA should conduct an Appropriate Assessment (on foot of a screening for Appropriate Assessment)?	No
8	Does the proposed change conflict with BAT as set out in the relevant BAT Conclusions? See here	No
9	Does the proposed alteration adversely affect the energy efficiency of the installation/facility?	No
10	Does the proposed alteration adversely affect the environmental risk of the installation/facility significantly ?	No

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11	Does the proposed alteration cause an increase above the capacity limitations specified in the licence?	No
12	Does the proposed alteration require an extension of operating hours (where controlled by the licence) for an installation/facility where the public is likely to have an interest in such an extension?	No
13	Does the proposed alteration involve the incineration or co-incineration of waste materials displaying hazardous properties that were not previously authorised (as per the WID/IED)?	No
14	Does the proposed alteration introduce materials or techniques which adversely alter the probability, magnitude and duration or complexity of the site transboundary impact?	No
15	Does the proposed alteration constitute a substantial change?	No
16	Does the proposed alteration require a change to a condition or schedule of the Licence?	Yes

Recommendation

Based on your responses to the forgoing questions the recommended option is for you to submit a 'Request Licence Amendment' for this proposed alteration.

To submit this request to the EPA you should locate it in the 'Request Alteration' area in LMA. Click on 'Proceed' against this saved request, and then click on the 'Request Licence Amendment' button (in STEP 2 of the process). Then you will be required to provide more detailed information about your proposed amendment.

Note: The responses you have provided in this Screening Report will form part of the information record if you decide to proceed with this alteration request.

Recommendation Date: 30/03/2019

Clerical or Technical Amendment Application Details

Proposed Alteration Description

In recent months the Licensee has formed the view that it will not be possible to proceed with its original proposal (made at the time of its waste licence application in 2008) to backfill the existing groundwater pond at the eastern end of its recovery facility to a level above the maximum seasonal level using 'clean, inert, highly permeable granular recycled aggregates of minimum 40mm class size'. This proposal was reflected in Condition 6.14.3 of the waste licence (Ref W0247-01).

The Licensee has come to this view in light of

- (i) the continued delay in the publication by the Agency of End of Waste criteria in respect of recycled aggregate produced from construction and demolition (ie. concrete) waste;
- (ii) the absence of any definitive quantitative national or sectoral guidance on acceptable threshold limits to be applied in determining whether or not recycled aggregate produced from construction and demolition waste is 'inert' in accordance with the requirements of Condition 6.

Priority	2. High
Category of Amendment	(c) Otherwise facilitating the operation of the licence (or certificate) and the making of the amendment does not result in the relevant requirements of section 83(5) of the EPA Act as amended/ section 42B(1) of the Waste Management Act as amended/environmental requirements ceasing to be satisfied

Licence Condition Changes

Condition / Schedule Reference	Current Condition / Schedule Wording	Suggested New Wording
6.14.3	<p>6. 14 Groundwater Management</p> <p>6.14.1 A visual inspection of the groundwater ponds for any evidence of contamination shall be carried out on a weekly basis. A log of such inspections shall be maintained.</p> <p>6.14.2 Effective groundwater protection management infrastructure shall be provided and maintained during the restoration and aftercare of the facility. As a minimum, the infrastructure shall be capable of the protection of the groundwater resources from pollution by the waste activities.</p> <p>6.14.3 The infilling of low-lying areas of the facility below and immediately above the water table shall be undertaken using only clean, inert, highly permeable granular recycled aggregates of minimum 40mm class size. Such infilling works shall be supervised by an appropriately qualified person, and that person shall be present at all times during which infilling works are being undertaken. The groundwater spring discharge shall be collected and discharged into the ground in accordance with Sectio</p>	<p>6. 14 Groundwater Management</p> <p>6.14.1 A visual inspection of the groundwater ponds for any evidence of contamination shall be carried out on a weekly basis. A log of such inspections shall be maintained.</p> <p>6.14.2 Effective groundwater protection management infrastructure shall be provided and maintained during the restoration and aftercare of the facility. As a minimum, the infrastructure shall be capable of the protection of the groundwater resources from pollution by the waste activities.</p> <p>6.14.3 The infilling of low-lying areas of the facility below and immediately above the water table shall be undertaken using only clean, inert, naturally occurring and previously undisturbed soil and stones from external source sites. Evidence of soil quality testing and confirmation of inert status shall be obtained in advance of its use for infilling of low lying areas. Records of advance testing and on-site compliance and verification testing shall be maintained on site and included in Annual E</p>

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Questions		
Q1	Is planning permission required to support the proposed alteration?	No
Q2	Does the application involve an installation boundary change?	No
Q3	Does the application involve changes to emissions to sewer?	No
Q4	Attach Appropriate Assessment Screening Report here	Behan TechAmendment 6.14.3 AA Screening Report.pdf

Additional Documentation	
ScreeningReport.pdf	

Final Declaration	
Name	Derek Luby
Position	Technical Director, SLR Consulting Ireland

Application Details			
Selected by:	Derek Luby	Selected date:	30/03/2019
Submitted by:	Derek Luby	Submitted date:	05/04/2019

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