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Ms. Lynn Morrissey

Mr. Brian Bruton

General e-mail contact

On behalf of Forge Hill Recycling Unlimited Company

29 August 2019

Reg. No.: W0291-02

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence application from Forge Hill Recycling Unlimited Company for an installation located at Forge Hill Recycling Unlimited Company, Forge Hill Waste Transfer Station, Forge Hill, Cork, T12 AK44

Dear Madam/Sir,

I refer to the application for a licence received by the EPA on 05 November 2018.

Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with the above mentioned legislation. You are therefore requested, in accordance with the regulations, to supply the information detailed below.

1. Section 4.3 *Waste Activities*, of the submitted *Application Form* provides a table of *List of Wastes by R&D Code and Treatment Type*, proposed for acceptance at the installation.
 - a. LoW code 20 03 01 refers to mixed municipal waste. Confirm if this refers to black bin waste. Provide detail of the treatment process to be applied to this waste. It is noted that Attachment 1.2 Non Technical Summary states that mixed dry recyclables (paper, plastics, cardboard, metal cans) are proposed to be treated at the installation.
 - b. In the context of the table, state why waste types accepted under LoW codes 15 01 02 *plastic packaging* and 20 01 39 *Plastics*, would be subject to Treatment Type; *Other recycling or reclamation of organic substances which are not used as solvents (to end-of-waste)*. Confirm if this is the correct treatment type to be applied and if these waste types are organic in nature.
 - c. LoW code 15 01 09 *textile packaging*, is not permitted in the existing licence (W0291-01). It has been stated in the application that “the composition of the additional wastes will be the same as those already accepted” therefore, please

state whether LoW code 15 01 09 is proposed to be accepted at the installation. If yes, describe the nature of the waste and the proposed treatment.

2. Prepare and submit an assessment against the BAT conclusions contained in Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 for waste treatment. Describe how each BAT conclusion applies or not and provide information on compliance with the requirement.
3. In relation to the fully enclosed trailer which is proposed to store non-recyclable residues externally, clarify the following:
 - a. Is the trailer designed to prevent leachate from the materials contained within.
 - b. What is the nature of the underlying surface where the trailer is stored and is the surface impermeable, and;
 - c. Provide an updated Waste Storage Plan Map (Drawing No. 14/4347-PL-04) showing the location of the trailer.
4. Section 4.7.2 *Proposed System* of the EIAR submitted states “rainwater run-off from the new paved area in the east of the site will be collected and connected to the drainage system that discharges to the Irish Water foul sewer.” Additionally, in a document submitted to Cork County Council planning department titled; *Response to Request for FI/Clarification (15/08/2018)* associated with planning application 185176, it is stated in *Item 5 – Storage of Waste, that* “Although the risk of contaminated rainwater run-off from the baled metals is low....the proposed storage area drains to the foul sewer, thus eliminating the risk to off-site water courses.” These statements do not appear to align with submitted drawing number 14/437-PL-03 which indicates that the new paved area in the east will drain to the surface water body located to the west of the site.
 - a. Confirm if the proposed external metals storage area drains to the foul sewer.
 - b. Confirm if the new paved area drains to the foul sewer.
 - c. If yes, revise and re-submit Foul Drainage Layout Drawing No. 14/4347-PL-02 and Surface Drainage Layout Drawing No. 14/4347-PL-03 to correctly reflect foul and surface water discharges.
 - d. Confirm if the roof overhang entirely covers the proposed metal storage area.
5. State the nature and confirm if the surfacing area outside extension 1, where the baled metals are proposed to be stored, is impervious.
6. It is stated on page 4 of the submitted Fire Water Risk Assessment, that “an engineered depression in the yard north of Building 1 that is filled with water is used, if required, as a wheel wash for trucks leaving the site.” State where the wheel wash water drains to on site and where is the sediment disposed.

In addition to the above, please also provide an updated non-technical summary (Application Form and EIAR) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

The requested information should be submitted to the Agency within **4 weeks** of the date of this notice, in order to allow the Agency to process and determine your application.

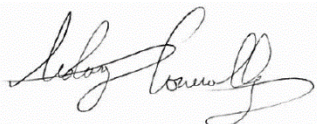
It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries please contact licensing@epa.ie.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Your response to this request is to be submitted via EDEN. Guidance on how to use this portal is available on the EPA website at <http://www.epa.ie/pubs/forms/lic/industrial%20emissions/licenceapplicationformguidance.html>.

Please direct any queries to licensing@epa.ie.

Yours faithfully,



Environmental Licensing Programme
Office of Environmental Sustainability
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