



Mr. Michael Martin
Inspector
Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
P.O. Box 3000
Johnstown Castle Estate
County Wexford

20th March 2020

Reg. No. W0304-01

Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations, in respect of a licence application from Packaging Laundry Limited for a facility located at Packaging Laundry Limited, Unit C4, Oldcourt Industrial Estate, Boghall Road, Bray, Wicklow, A98P6N3

Dear Mr. Martin,

I refer to correspondence received through EDEN in relation to the above referenced waste licence application.

In accordance with the Regulations and on behalf of the Applicant, Verde hereby supplies the following information:

- Details of the Site and Building Ownership Status
- Details of the proposed acceptance, processing and disposal/recovery procedures for 15 01 05 (Composite Packaging), 15 01 01 (Paper and Cardboard Packaging) and 15 01 03 (Wooden Packaging)
- Confirmation of the proposed Hours of Operation
- Copy of the Certificate of Incorporation for the Applicant, Packaging Laundry Limited

Each of the above listed items is addressed below and associated attachments are included in this correspondence. An updated non-technical summary is attached to reflect the information provided.

➤ Site and Building Ownership Status

The current lease on the on the premises is up for renewal on 27th April 2020. It is confirmed that Packaging Laundry will continue to occupy the premises after that date and that the Company is in the process of purchasing the premises



from the current landlord. To that end, please see attached correspondence from the landlord confirming that process is underway. The purchase will include the current leased/occupied area as well as additional storage space at Unit 3C. The combined area is indicated on revised Figures 1 and 2 attached.

Figure Title	Original Figure No./Date	Revised Figure No./Date
Site Location Map	No. 1 – Jun. 2019	No. 1 (v2) – Mar. 2020
Site Layout Map with Drainage Layout	No. 2 – Jun. 2019	No. 2 (v2) – Mar. 2020

- Details of the proposed acceptance, processing and disposal/recovery procedures for List of Waste Codes 15 01 01, 15 01 03 and 15 01 05

The main activity at the site will continue to be the refurbishment of empty IBCs and the total tonnage sought in the application is up to 1,650 tonnes per annum. Details for 15 01 01, 15 01 03 and 15 01 05 are provided below.

15 01 03 Wooden Packaging

Steel drums that are transferred to the facility are generally transported on wooden pallets. The suppliers of these drums and pallets may want neither returned, therefore, they are essentially discarding this packaging and the materials are therefore defined as waste.

Steel drums are typically re-conditioned at the facility. Upon completion of the reconditioning, the drums are shipped out to customers on wooden pallets retained at the facility. Occasionally, the facility is in receipt of wooden pallets that are damaged beyond reuse. In such cases, pallets are retained on site until such time as enough have accumulated to facilitate collection and transfer to an authorised waste management facility such as Ire-Well Pallets Limited (Permit Reg. Ref. No. WFP-WX-16-0121-01), where pallets can be refurbished.

15 01 05 Composite Packaging

This LoW Code is included to allow for the continued collection of empty Intermediate Bulk Containers (IBCs) without residues of or contaminated by dangerous substances. Depending on their specification, the IBCs can have a steel, plastic or wooden pallet base. The List of Waste Code 15 01 05 covers variation in the packaging waste concerned.

15 01 01 Paper and Cardboard Packaging

To provide a complete service to our customer base, we may occasionally have a requirement to collect empty Fibre Drums and/or corrugated boxes. Fibre Drums, as illustration in the photograph below, have steel chimbs crimped onto the cardboard body of the drum.



Photo. 1 – Fibre drum (paper and cardboard packaging)

The steel chimbs can be removed using a ‘de-chimber’ machine. Steel and cardboard can then be baled in separate waste streams and sent off-site for recycling. Corrugated cardboard boxes would also be baled and forward to a cardboard recycling facility.



Photo. 2 – Baled Steel and Cardboard

➤ Proposed Hours of Operation

As stated, the existing hours of operation are currently conditioned by a facility permit issued by Wicklow County Council (Permit Reg. Ref. No. WFP-WW-18-0043-01). These hours are 08.00 – 18.00, Monday to Friday.

An extension to these hours is sought so that operations can take place from 07.00 to 18.00 from Monday to Saturday inclusive. The revised hours of operation being sought are consistent with existing operational hours of other occupants within Oldcourt Industrial Estate.



➤ Certificate of Incorporation for Packaging Laundry Limited

A Certificate of Incorporation is attached and includes reference to Number 612115.

➤ Additional

An updated non-technical summary is attached and reflects minor changes outlined above.

Given the nature and small scale of the activity that will be undertaken under Licence, we hereby request that this application is prioritised for determination. Please contact the undersigned in relation to matters relating to this request.

I trust that this is in order.

Yours sincerely,

Malcolm Dowling
Principal Environmental Consultant
Verde Environmental Consultants
For and on behalf of,
Packaging Recycling Limited

*For inspection purposes only.
Consent of copyright owner required for any other use.*



ATTACHMENTS

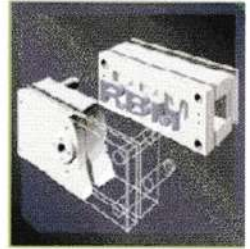
Details on building ownership status
Certificate of Incorporation for Packaging Recycling Limited
Updated Non-Technical Summary

For inspection purposes only.
Consent of copyright owner required for any other use.



RICHARD BARRETT MOULDS LTD

Old Court Industrial Estate, Boghall Road, Bray, Co. Wicklow, Ireland
Telephone : 353-1-2829842 / 2828970 / 2867451
Facsimile : 353-1-2868011
E-mail : info@rbm.ie
Web site : www.rbm.ie



18th March 2020

Packaging Laundry
Unit C4
OldCourt Business Park
Boghall Road
Bray
Co. Wicklow

To whom it may concern,

Richard Barrett Moulds Ltd. landlord of Unit C4, Oldcourt Business Park, Boghall Road, Bray, Co. Wicklow is providing this letter to confirm that the tenants, Packaging Laundry, who currently occupy the premises at the same address are in the process of purchasing the unit C4 and the front half of adjacent Unit C3.

Yours sincerely,



Mark Barrett
On the behalf of
Richard Barrett Moulds Ltd.

For inspection purposes only:
Consent of copyright owner required for any other use.

Number 602115

Certificate of Incorporation

I hereby certify that

PACKAGING LAUNDRY LIMITED

is this day incorporated under
the Companies Act 2014,
and that the company is
a Private Company Limited by Shares.

*For inspection purposes only.
Consent of copyright owner required for any other use.*

Signed By: On Behalf of The Registrar of Companies
Signing Date: Mon, 10 Apr 2017 06:51:11 GMT +01:00
Reason: I certify this document
Location: Dublin, Ireland
Contact Info: digital.certs@cro.ie

CRO 

Given under my hand at Dublin, this
Monday, the 10th day of April, 2017



for Registrar of Companies

LICENCE REFERENCE No.	REPORT TITLE	REPORT VERSION
LA004392	Non-Technical Summary - Packaging Laundry Ltd	Version V2 - Final



*For inspection purposes only.
Consent of copyright owner required for any other use.*

Non-Technical Summary for Waste Licence Application

Packaging Laundry Limited

TABLE OF CONTENTS





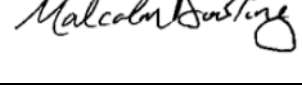

1	INTRODUCTION	4
2	FACILITY OPERATIONS	5
2.1	IBC Reconditioning (Closed-Loop).....	6
2.2	IBC Reconditioning (Open-Loop).....	7
2.3	Steel Barrel Reconditioning (Open-Loop)	7
2.4	IBC Dismantling and Rebottling	8
2.5	Steel Drum Dismantling	8
3	MATERIALS	10
4	EMISSION SOURCES	11
4.1	Emissions to Air.....	11
4.2	Emissions to Surface Water	12
4.3	Emissions to Sewer	12
5	ENVIRONMENTAL CONDITIONS	14
6	REDUCTION/ABATEMENT SYSTEMS	14
7	WASTE MANAGEMENT	15
8	SPILL MANAGEMENT & ABNORMAL OPERATING CONDITIONS	16
9	MONITORING & SAMPLING OF EMISSIONS	17

For inspection purposes only.
Consent of copyright owner required for any other use.

DOCUMENT CONTROL

Project Title: Waste Licence Application – Non-Technical Summary
Licence No. LA004392
Project No: 52252
Status: Version V2 - Final
Client: Packaging Laundry Limited
Client Details: Packaging Laundry Limited, Unit 4C/3C, Oldcourt Industrial Estate, Boghall Road, Bray, County Wicklow
Issued By: Verdé Environmental Consultants Limited

Document Production / Approval Record

	Name	Signature	Date	Position
Prepared by	Joshua Copage		01 July 2019	Senior Environmental Consultant
Contribution by	Daniel Moore		02 July 2019	Environmental Scientist
Reviewed by	Malcolm Dowling		02 July 2019	Principal Environmental Consultant
Approved by	Kevin Cleary		03 July 2019	Project Director
Revised by	Malcolm Dowling		19 March 2020	Principal Environmental Consultant
Approved by	Kevin Cleary		20 March 2020	Project Director

For inspection purposes only. Consent of copyright owner required for any other use.

1 INTRODUCTION

Packaging Laundry Limited, hereafter referred to as Packaging Laundry, is applying for a Waste Licence for their existing waste management facility located in the Oldcourt Industrial Estate, located off the Boghall Road in Bray, County Wicklow (Figure 1 (v2) attached). The facility is currently authorised to operate through a waste facility permit issued by Wicklow County Council (Permit No. WFP-WW-18-0043-01) and its primary activity relates to the acceptance and re-conditioning/refurbishment of empty industrial packaging (notably intermediate bulk containers known as IBCs). The permit allows collection of packaging defined under List of Waste Codes 15 01 02 and 15 01 04. The company plans to expand services so that limited packaging defined under List of Waste Code 15 01 10* can be accepted and refurbished. To facilitate this activity, Packaging Laundry has been advised by the Environmental Protection Agency through the article 11 process that a waste licence is required. The primary objective of this summary is to outline, in non-technical language, the details of the waste licence that is being applied for.

The facility operates from a property that is located within the Oldcourt Industrial Estate (also known as the Oldcourt Business Park). The property is currently leased, though Packaging Laundry is in advanced negotiations to purchase the site and an adjoining storage facility. The industrial/commercial park is located just off the Boghall Road in Bray, County Wicklow and features a range of tenants including a vehicle maintenance company, a flooring supply company, a paint supply and decorating centre and a packaging component company. The property is located close to the industrial park's sole entrance and exit onto Wurtzburg Avenue. Packaging Recycling unit currently operates from a warehouse/industrial unit (4C) with an associated triangular enclosed yard area on its eastern side. The overall site area, including the foreyard and storage yard areas is approximately 0.135 hectares. With the addition of the adjoining premises to be used for storage, the licensed area will comprise c. 0.203 hectares, as shown in attached Figure 2 (v2).

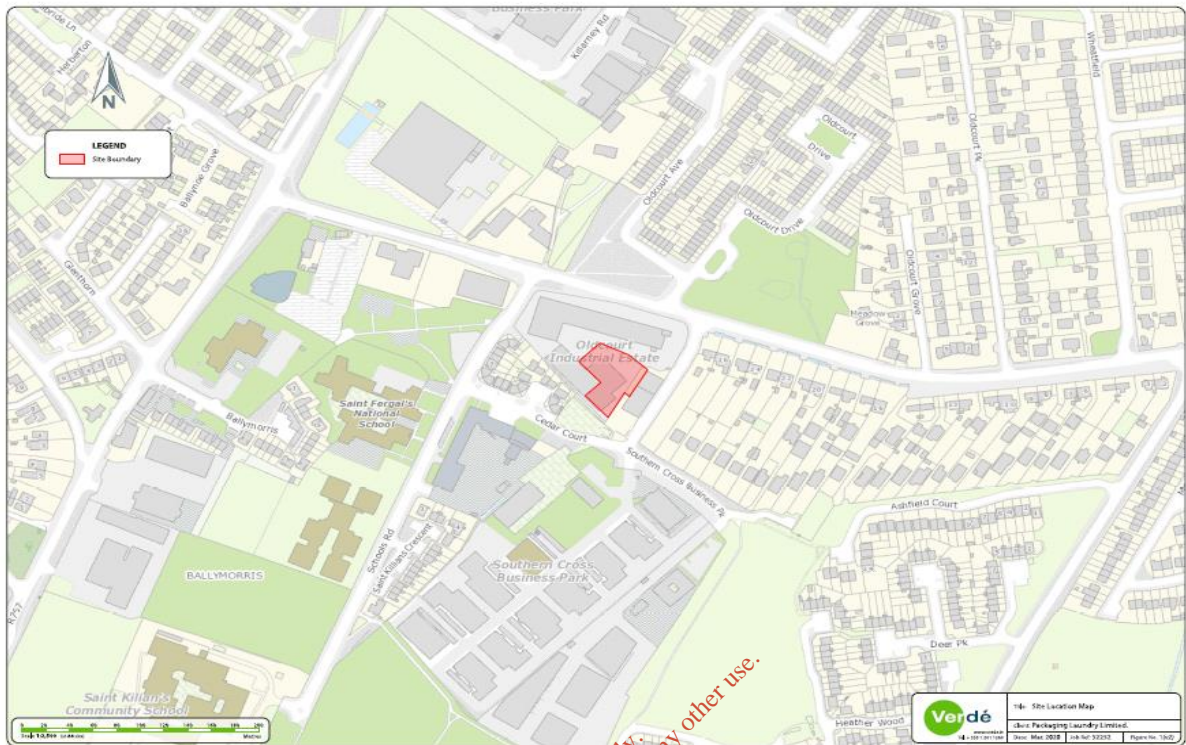


Figure 1 (v2) - Site Location - Oldcourt Industrial Estate, Boghall Road, Bray, County Wicklow (Open Street Maps 2019)

2 FACILITY OPERATIONS

The primary focus of activity at the facility is the refurbishment/reconditioning of a range of empty industrial packaging that is received from existing customers of Packaging Laundry. The primary packaging accepted is empty IBCs. A permit issued by Wicklow County Council allows the acceptance and treatment of plastic packaging (List of Waste Code 15 01 02) and Metallic Packaging (15 01 04). A Closed Loop IBC Reconditioning service allows Packaging Laundry to provide a reconditioning service for customers, whereby used, empty IBCs are transferred to the facility, refurbished and returned to the customer for same purpose re-use. The process is described in more detail below. Other services include open loop reconditioning, steel packaging reconditioning, IBC dismantling and rebottling and steel drum dismantling. The licence application relates to an expansion in the list of waste codes that will be acceptable at the facility. Packaging Laundry has been advised by the Agency that a Licence is required to accept packaging code 15 01 10* (Packaging containing residues of or contaminated by hazardous substances). The company also plans to include additional waste codes on its licence including composite packaging and wooden packaging.

Existing hours of operation as conditioned by the facility permit are 08.00 – 18.00, Monday to Friday. Packaging Laundry Limited seeks to extend these hours so that operations can take place from 07.00 to 18.00

from Monday to Saturday inclusive. The revised hours of operation being sought are consistent with operational hours of other occupants within the Estate.

The type and quantity of wastes to be handled, stored and treated on site are described in Table 2.1 below;

Table 2.1 Summary details of planned, licensed waste types and quantities for proposed facility.

<i>LoW Code</i>	Description of Waste	Annual Tonnage
<i>LoW 15 01 02</i>	Plastic Packaging	100
<i>LoW 15 01 04</i>	Metallic Packaging	250
<i>LoW 15 01 05</i>	Composite packaging	400
<i>LoW 15 01 01</i>	paper and cardboard packaging	100
<i>LoW 15 01 03</i>	Wooden Packaging	200
<i>LoW 15 01 10*</i>	Packaging containing residues of or contaminated by hazardous substances	600
	Total Tonnage PA	1,650

***Waste code relating to requirement for EPA Waste Licence**

A summary of current material processing is provided below. These established practices will be retained and applied subject to condition, pending the issuance of waste licence by the Agency. In general, Packaging Laundry accepts empty IBCs and steel drums which are refurbished (through cleaning, drying and leak testing) and prepared for re-use. In certain instances, these packaging containers are dismantled and reconstituted (through the replacement of IBC bottles for example) or where they cannot be re-used, the containers are dismantled (cut into manageable pieces) and prepared for transfer to an authorised waste recovery/recycling facility.

2.1 IBC Reconditioning (Closed-Loop)

This is a popular service that is offered by Packaging Laundry to its regular customer base. As a sustainable alternative to having to discard used containers, Packaging Laundry accepts empty IBCs for reconditioning before return to the same customer for re-use for the same purpose. A number of Irish companies send IBC's to the UK for reconditioning, incurring significant carbon footprint and transport costs. IBC containers are designed to be re-used and the closed loop reconditioning service (and indeed open loop described below) encourages this and complies with the waste hierarchy in encouraging the prevention of waste and the re-use of materials. The service is similar in principal to that of a launderette.

Strict controls are in place prior to entering into a contract with a customer. Before agreeing to accept an IBC, the Safety Data Sheet (SDS) for the former contents of the IBC is reviewed. Customers are made aware of a “Stop List”, that is, a list of former material contents that render an IBC unacceptable at the facility.

The customer must also complete a container returns form. IBCs are delivered to site via permitted hauliers usually engaged by the customer and all loads are inspected prior to the acceptance onto the site. Containers are initially inspected to ensure all are empty and that correct labelling of contents is visible on each IBC. Any container found either to have held an unsuitable compound (listed on the “Stop List”), or found to be missing former content detail, is refused entry onto the facility and is returned directly to the customer with explanation for refusal. Each container is also inspected to ensure that they are empty, that is, as empty as practically possible. Non-empty containers are similarly refused entry and are returned to the customer.

Containers external surfaces are cleaned and labelling removed. The inside of the container is then cleaned/washed using a three-stage high pressure/low volume water system. A specialist 360° hose is mechanically lowered inside the IBC which cleans the interior of the container using high pressure water spray at 400 Bar pressure. The containers undergo a three-stage washing process before the cleaning water is drained. The wash water is pumped into a 5,000 litre bunded storage tank prior to licensed discharge under controlled conditions (testing prior to discharge) to the municipal sewer.

Cleaned IBCs are then dried using fan dryers before undergoing a pressure test. Any faulty seals or taps found during pressure testing are replaced. The final inspection can also include painting of the steel cage to improve the appearance and mitigate rust. IBC containers are then labelled to indicate they have been reconditioned and tested before being made available for transport back to their owners. There are several advantages to the close loop system – sustainability, prevention of waste and certainty of re-use. The system reduces the financial burden on customers who are not required to purchase brand new replacement containers. IBCs, by their nature, are designed to be used multiple times.

2.2 IBC Reconditioning (Open-Loop)

Open Loop Reconditioning is the process whereby Packaging Laundry collect an IBC either free of charge or for a rebate from a company who has emptied their material out of the IBC and has no further use for it. Once reconditioned using the same process outlined above, these IBCs are sold to customers as certified, reconditioned IBCs.

2.3 Steel Barrel Reconditioning (Open-Loop)

Open-top steel drums arriving to site undergo the same inspection protocol that is implemented for IBCs and must be as empty as practically possible. Labels are removed from the outside of the drum. To remove any

residue, the lids are removed, and the drums are inverted and placed over a steel collection bund inside a drum oven which is heated allowing residue to liquefy and flow into the bund. Collected residue is transferred to an IBC for storage prior to collection by Lehane Environmental for recovery. Lids are replaced onto the drums which are palletised for supply to a customer for re-use.

Packaging Laundry also accepts steel tighthead drums. Following an identical acceptance and preparation procedure listed above, the steel is then cleaned for re-use. Once Labels and closures are removed, drums are placed inside a purpose-built drum cleaning cabinet. A spinning wand automatically rotates inside the steel drums for two wash cycles at 200 bar pressure. Wash is pumped from a collection sump in the bottom of the drum washer into the 5,000-litre holding tank. As per above, the effluent is tested prior to discharge to the municipal sewer under conditions contained in a discharge licence issued by Irish Water.

2.4 IBC Dismantling and Rebottling

IBCs with a bottle no longer suitable for reconditioning or that fail the leak test are also accepted onto the site in line with conditions of the current WFP. All end of life IBCs are delivered onto the site following the same acceptance protocol implemented for all containers. IBCs are washed and dried using the same processes as those described above for refurbishment. Following drying, IBCs are removed to a dedicated area where the HDPE bottles are cut into 6 manageable 1m x 1m panels. Cutting of the IBCs is performed by staff on site using an electrical reciprocating saw. The panels are then stored on site to await authorised transfer to an off-site licenced facility for HDPE regrinding and recycling (current outlet is Leinster Environmental, Permit Ref. No. WFP-LH-11-0002-02). All processes on site are managed in compliance with conditions of the Waste Facility Permit (WFP-WW-18-0043-01) issued by Wicklow County Council. New bottles are then placed into the Reconditioned IBC steel cages and made available for re-use to customers.

2.5 Steel Drum Dismantling

Steel drums which are not suitable for re-use are accepted onto site as per waste acceptance protocols referred to above. The drums are then washed in the steel drum washer and are crushed in preparation for steel recovery at an appropriated licenced facility (currently sent to Multimetals Recycling in Wicklow Town - Permit Reg. No. WFP-WW-09-0014-05).

2.6 Steel Drum Dismantling

Whilst the main activity at the site will continue to be the refurbishment of empty IBCs, additional packaging codes referred to below are sought for inclusion on the Licence. These codes are 15 01 01, 15 01 03, 15 01 05 and 15 10 01 as referenced in Table 2.1.

An overview of the internal site layout is provided below.

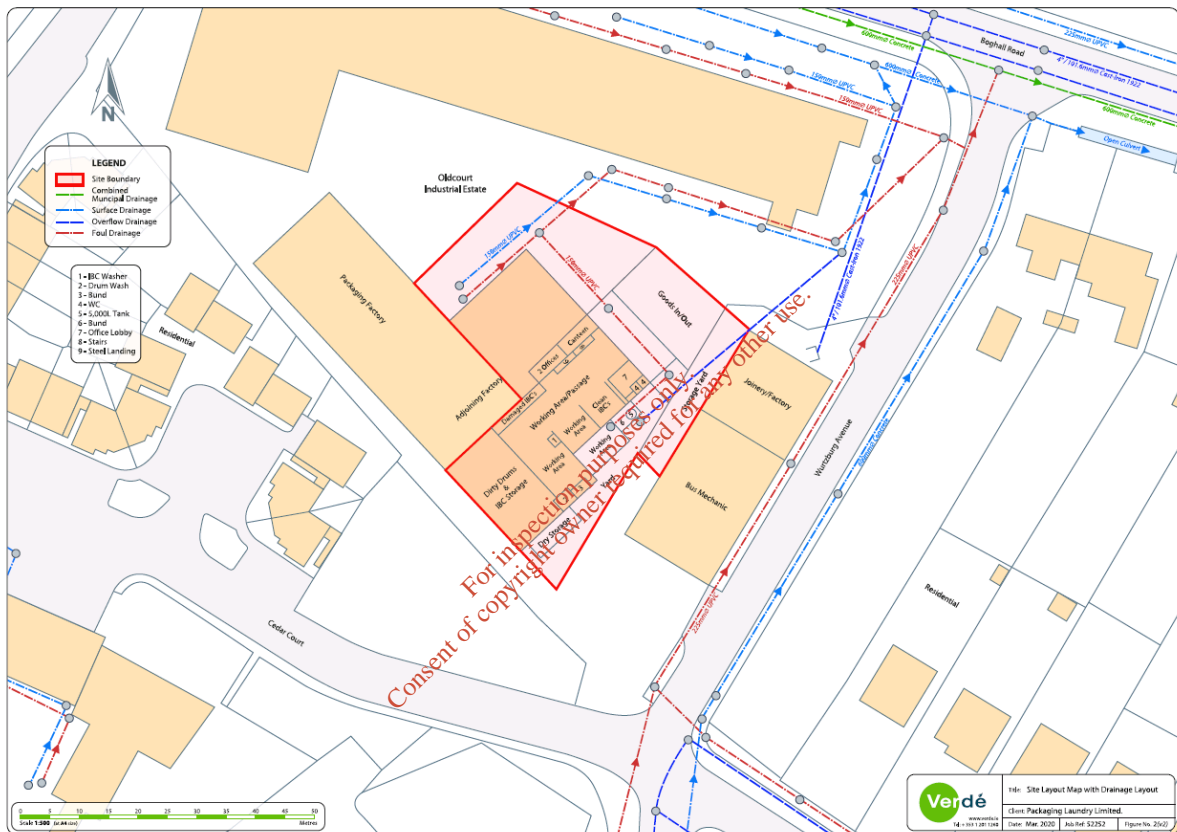


Figure 2 (v2). Site Layout – Overview of site layout with areas of work and drainage network illustrated.

3 MATERIALS

Materials used in day to day operations at the facility include the following (referred to also in Attachment-4-6-2-Raw Materials);

- Dilute (HCL) acid for the pH neutralisation of wastewater prior to discharge (1,000L)
- Antifoaming agent to facilitate high pressure washing of containers (80L)
- Alcohols (n-butanol) used in the flushing stages of steel drum cleaning (1,500L)
- Small amounts of assorted paints for reconditioning containers (40L)
- Small amounts of assorted domestic cleaning substances for general use within staff canteen and bathrooms (surface cleaners, bleach etc.) (10L)
- Small amounts of pest control product (1kg)
- Small amounts of general-purpose lubricants and solvents (5L)

Given the scale of the operations proposed at the site (maximum 1,650 tonnes per annum), only small amounts of the above listed materials will be retained on site at any one time. Any of these substances/chemicals that are stored on site are kept in appropriately bunded containers which are leak tested and certified as outlined in the current Waste Facility Permit.

For inspection purposes only.
Consent of copyright owner required for any other use.

4 EMISSION SOURCES

The primary activity at the facility will continue to be the recovery and reconditioning of used packaging comprising plastic, metal or composite materials (mainly IBCs). In terms of waste management facilities, emissions are limited at the Packaging Laundry facility due to the scale of the operation, limited type of material accepted and nature of processing undertaken. The activity does not generate significant dust, noise or odour and there is no discharges to groundwater.

The main source of emissions will continue to be the discharge of wash water to the municipal sewer. This is currently undertaken in compliance with a discharge licence issued by Irish Water under the Local Government (Water Pollution) Acts, 1977 & 1990, as amended. Wash water is contained within a 5,000 litre bunded tank, prior to controlled (see below) discharge to sewer. Other minor emissions are described below.

4.1 Emissions to Air

There are no significant emissions to air associated with the operation of the facility. No significant amounts of Volatile Organic Compounds are stored on site other than the kerosene used to heat the boiler supplying water for the power washer. This kerosene is stored in a tested and certified tank which is stored in a bunded area which will contain any fluids in the event of a leak or breach.

A Nilfisk-alto Neptune 5-57X Hot Power Washer is occasionally used to clean the external surfaces of IBC tanks. This uses an ECoPower diesel boiler, rated to 92% efficiency by the manufacturer. The facility consumes about 1.2 tonnes (1,500 litres) of kerosene annually in the fuelling and usage of this power washer. Using the Sustainable Energy Authority of Ireland's (SEAI) 2019 emission conversion information, it is estimated that approximately 4 tonnes of CO₂ is emitted annually through the use of the power washing device.

As outlined in the Site Condition Report (Attachment-4-8-4), particulate matter arising from the decommissioning of plastic packaging materials, is not expected to occur in any significant quantities. The small scale of decommissioning activity and the maintenance of good housekeeping policies, coupled with the indoor location of such processes, will keep any particulate emissions to a minimum. Whilst no quantitative information is available on on-site plastic particulate generation is available, an EPA ambient air quality monitoring station is located less than 100m from the facility. Results of airborne particulate matter (PM2.5 and PM10) measured at this station indicate that Bray has an AQIH rating of Good.

The facility does not generate significant emissions of dust or particulates to the local atmosphere.

4.2 Emissions to Surface Water

General storm water from the surfaces and roofs on-site is drained via gutters and pipes to the municipal storm water drainage system.

As well as this, IBCs that are accepted onto the site (having been screened and approved as per waste acceptance procedures described) are initially stored in the goods receiving area in front of the facility. If required, the external surfaces of the IBCs are washed using a Nilfisk-alto Neptune 5-57X Hot Power Washer. Containers are washed externally using 12bars of pressure and water set at 80 degrees. The resulting water drains to the local storm water drainage system after going through an installed drain mesh and silt trap. This drainage route is in place as per the current Waste Facility Permit and does not involve the washing or removal of chemical or substances from the containers, but instead is primarily to ensure all labelling is removed and the external surfaces of the containers are aesthetically clean.

4.3 Emissions to Sewer

The main emission source associated with current and future activity at the facility is the licensed discharge to sewer of wash water arising from the internal laundering of containers. Water from the washing process is drained and stored pending release in a 5,000 litre bund protected, water storage tank. The tank is monitored prior to discharge to public sewer to ensure compliance with emission limit values contained in Discharge Licence W-DTS-809938-01 issued Irish Water discharge licence in 2017.

Prior to discharge, water within the tank is tested for pH as per condition of the Discharge Licence. If found to be outside the emission limit value (6.0 – 10.0 pH units), the water is neutralised through dosing with dilute Hydrochloric Acid (HCL). Records of pH and flow are measured before every discharge. These records are retained on site. As per Schedule B of the Discharge Licence, the discharge is sampled on a quarterly basis and tested by an accredited laboratory for a range of parameters. Results are forwarded to Irish Water in the annual report due before 31st January each year. The parameters and associated acceptance limits are outlined in Table 2.2 below.

The facility has 3-4 people working on site. Apart from the sewer discharge emissions associated with the wash water produced on site, sanitary wastewater is discharged directly to the municipal foul sewer.

Table 24.1 - Summary of Irish Water Discharge Permit Threshold Parameters

<i>Parameter</i>	<i>Concentration (mg/l)</i>	<i>Load (kg/day)</i>
<i>Biological Oxygen Demand (BOD)</i>	1000	5
<i>Chemical Oxygen Demand (COD)</i>	3000	15
<i>Total Suspended Solids</i>	1000	5
<i>Fats, Oils and Grease</i>	100	0.5
<i>Total Phosphorous</i>	15	0.075
<i>Total Ammonia (As N)</i>	20	0.1
<i>Chloride</i>	1000	5
<i>Sulphate</i>	800	4
<i>Detergents (MBAS)</i>	100	0.5
<i>Flow (m³/day or m³/hr)</i>	5.0 or 0.5	
<i>pH</i>	6.0 – 10.0	
<i>Temperature (°C)</i>	35.0	
<i>Toxicity (Toxicity Units*)</i>	10.0	

5 ENVIRONMENTAL CONDITIONS

A Site Condition Report (Attachment-4-8-4) was completed as part of the waste licence application, describing current site conditions at the facility.

In summary there is no historical record of or any evidence of soil, groundwater or surface water contamination at the site. Similarly, there have been no noise, dust or odour nuisance issues attributed to the operation of the facility since operations commenced.

6 REDUCTION/ABATEMENT SYSTEMS

The following systems are in place to abate the discharge of certain substance to the municipal foul and storm water draining networks;

- Wastewater arising from internal washing of tanks is collected and stored in a 5,000L bunded storage tank. This tank facilitates the following;
 - Controlled discharge of wastewater to the sewage network
 - pH neutralisation of wastewater prior to discharge
 - Scheduled sampling of wastewater
- Wash water arising from the occasional external washing of IBC tanks at the facility drains to surface water. The abatement of solid material discharge to this network is provided by;
 - Silt traps within the storm drain receiver
 - Particulate & debris trap in the form of mesh drain traps

These abatement features are cleaned as part of the established housekeeping practices to ensure their continued efficacy.

7 WASTE MANAGEMENT

The primary activity at the facility involves the re-conditioning/refurbishment of packaging containers (notably IBCs) for re-use either through a closed loop arrangement where containers are returned directly to their owners or through an open loop whereby refurbished containers are provided to other customers as alternatives to new IBCs.

In terms of residual waste material, defective containers that have reached their end of life are accepted at the site. These are treated through washing, drying, cutting and/or crushing so that they are transferable through an authorised collection service to an appropriate metal or plastic recovery/recycling facility. For example, decommissioned metal drums are sent to Multimetals Recycling in Wicklow Town. Containers requiring decommissioning are subject to the same cleaning and screening procedures as those undergoing reconditioning; at which point the HDPE plastic containers are taken to a designated, indoor area where they are cut into 1m x 1m panels using an electrical reciprocating saw. These panels are stored on site in bails and are then transported to Leinster Environmental (WFP-LH-11-0002-02) in County Louth for HDPE regrinding and recycling. If re-usable, the remaining steel cage from the decommissioned IBC is then reconditioned as per normal procedure and a new/reconditioned IBC plastic tank installed. The nature of this business means that residual waste is prevented where possible. Most of the materials entering the facility are reconditioned for re-use.

Other wastes originating from the operation of the facility include general and recyclable municipal type waste. These wastes are segregated into appropriate 240 litre bins for collection by an authorised waste management company (Greenstar).

8 SPILL MANAGEMENT & ABNORMAL OPERATING CONDITIONS

In compliance with Conditions 7.1 and 7.2 of the current Waste Facility Permit, Packaging Laundry has developed an Emergency Preparedness and Response Plan (MN01). This Plan includes the procedural response to be taken in the event of a chemical or wastewater spill at the facility. With regard to such an event occurring, the Plan outlines the following procedure;

- Immediately report the occurrence to the Operations Manager
- The spill should be contained immediately to prevent pollution to on-site storm water drainage
- Ensure personnel are fully protected through usage of PPE
- Locate the source of the spillage and turn off tap or valve, plug the leak or roll the drum/IBC so that the hole is on the top
- If this is not possible, use containers to catch the escaping liquid.
- In the event where a flood or spillage cannot be contained, contact the Fire Brigade
- Switch off or remove any sources of ignition close to the spill
- Block access to Factory drainage, gullies etc., through the correct use spill containment kits as appropriate
- Do not wash liquid away with water as this may disperse any contaminant off-site
- Contaminated absorbents shall be bagged and skipped and disposed of as special waste
- Seal off the contaminated area
- Clean the contaminated area
- Record the spillage on the waste facility permit compliance log, detailing the circumstances of the incident and the remedial action taken
- Submit report to Wicklow County Council or the Agency

In addition to the above scenario and spill management, the Emergency Preparedness and Response Plan includes Standard Operating Procedures (SOPs) for the following emergency incidents;

- Fires or Explosions
- Electrical Emergencies

Packaging Laundry's Emergency Preparedness and Response Plan aims to reduce, minimise or eliminate the likelihood of negative environmental impacts occurring in the event of an unforeseen event or accident.

9 MONITORING & SAMPLING OF EMISSIONS

Operations at the site are currently undertaken in compliance with conditions of a waste facility permit that was issued by Wicklow County Council in May 2018.

Given the scale of the facility, there are no conditioned monitoring requirements provided for in the Permit.

The facility also operates under a Wastewater Discharge Licence issued by Irish Water (IW-DTS-809938-01). Monitoring is required on a quarterly basis to comply with conditions of that Licence. A list of parameters to be monitored is included in Schedule B of the Licence and is reproduced in Table 4.1 above.

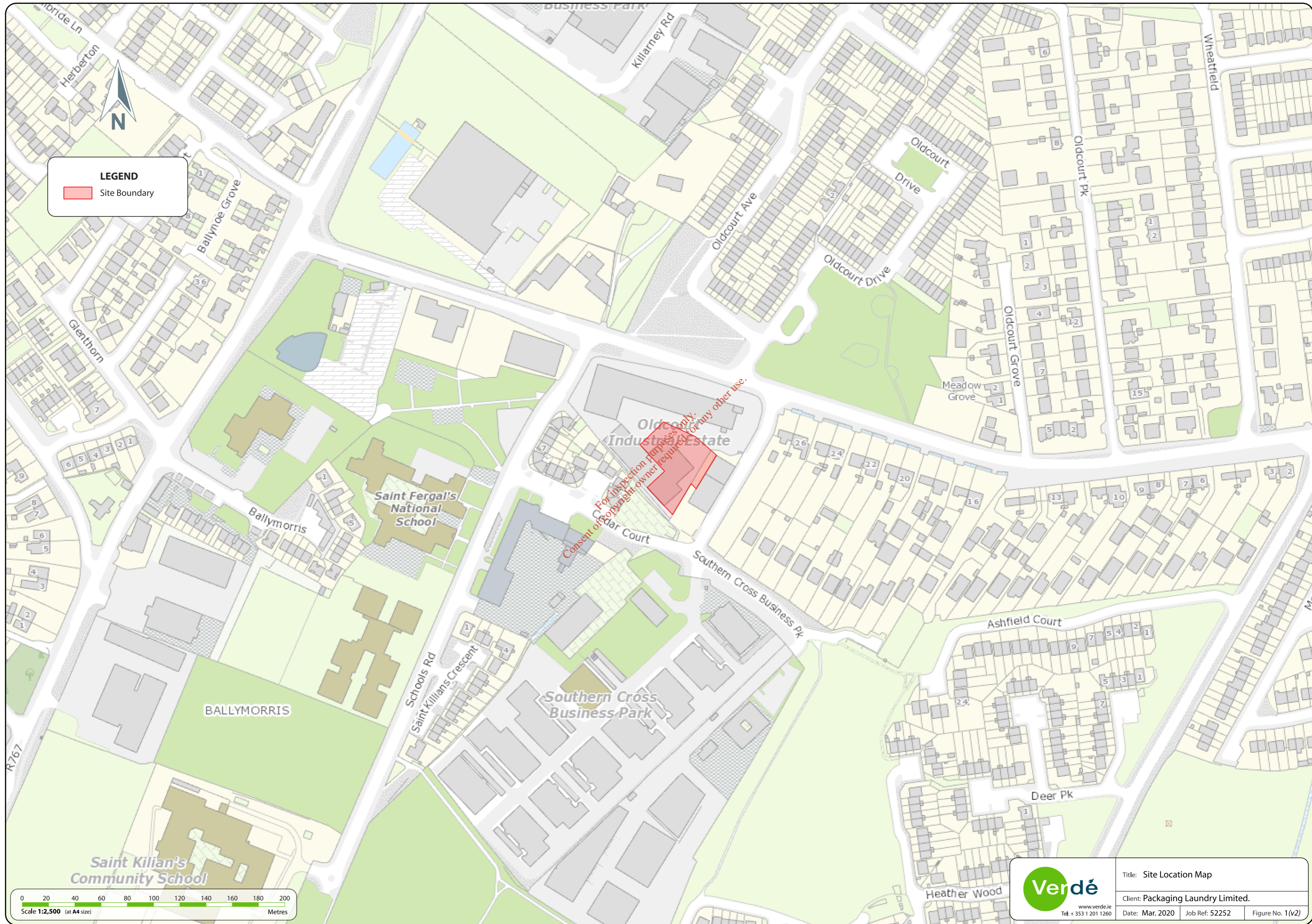
*For inspection purposes only.
Consent of copyright owner required for any other use.*



FIGURES 1 (V2) AND 2 (V2)

For inspection purposes only.
Consent of copyright owner required for any other use.






LEGEND

Site Boundary



*Saint Kilian's
Community School*

For inspection purposes only.
Consent of copyright owner required for any other use.



www.verde.ie
Tel: +353 1 201 1260

Title: Site Location Map

Client: Packaging Laundry Limited.

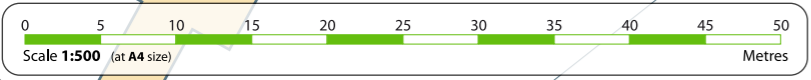
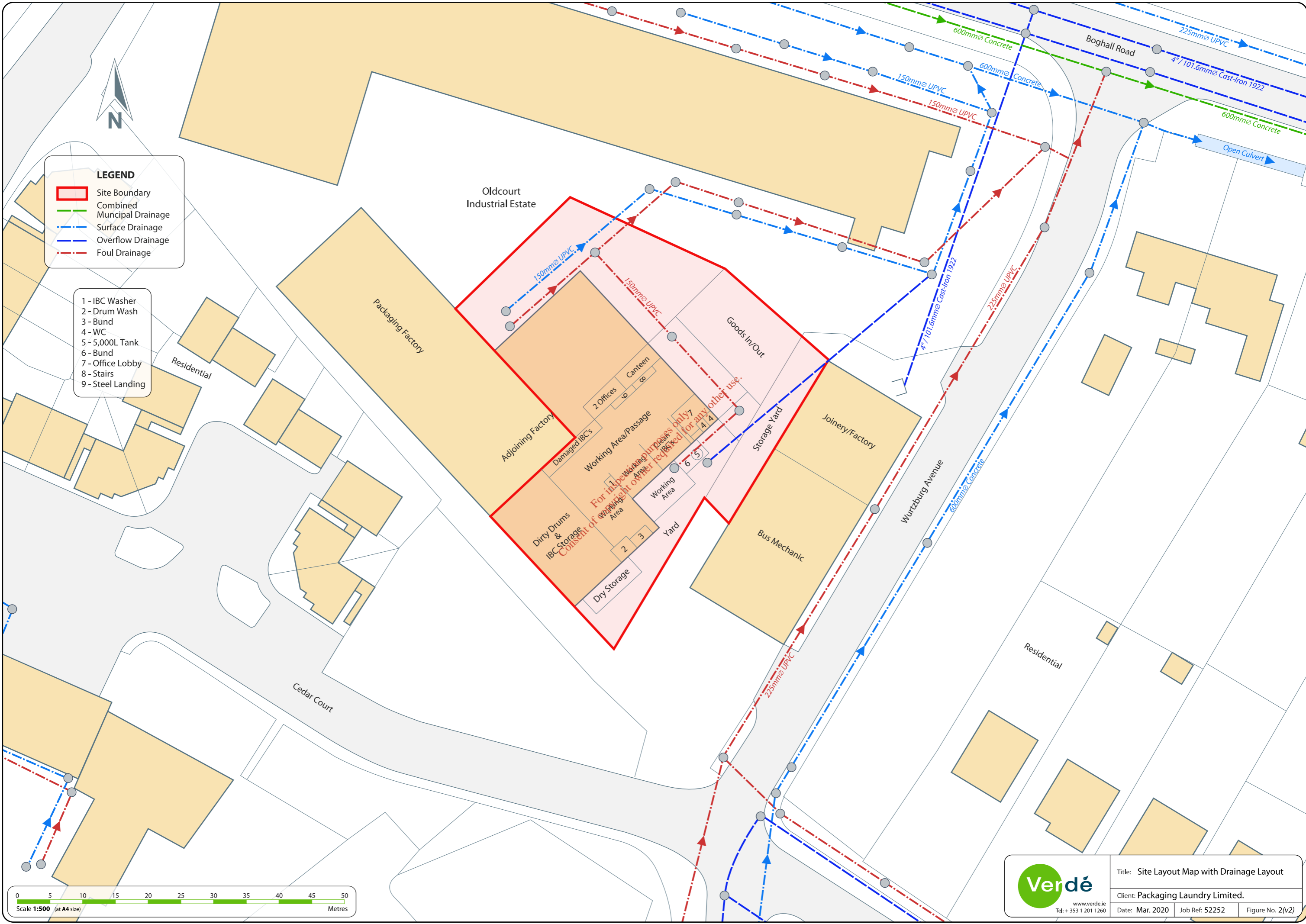
Date: Mar. 2020 Job Ref: 52252 Figure No. 1(v2)



LEGEND

- Site Boundary
- Combined Municipal Drainage
- Surface Drainage
- Overflow Drainage
- Foul Drainage

- 1 - IBC Washer
- 2 - Drum Wash
- 3 - Bund
- 4 - WC
- 5 - 5,000L Tank
- 6 - Bund
- 7 - Office Lobby
- 8 - Stairs
- 9 - Steel Landing



www.verde.ie
Tel: +353 1 201 1260

Title: Site Layout Map with Drainage Layout

Client: Packaging Laundry Limited.

Date: Mar. 2020
Job Ref: 52252
Figure No. 2(v2)