

EPA Application Form

9.1 - Environmental Management Techniques - Attachment

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Organisation Name: *

HealthBeacon Ltd

Application I.D.: *

LA006978

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 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.

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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 * |
| Measures to prevent the discharge of aqueous emissions to the environment | Wastewater from the wash process will be collected in a bunded IBC on-site before being collected from the site by an authorized waste collector and sent to an appropriate waste treatment facility. The Wastewater Storage IBC on-site will be double skinned in order to prevent the accidental release of wastewater in the event the interior IBC ruptures. | If required, Visual Inspection of IBC by a Chartered Engineer will take place every three years in accordance with anticipated Licence Conditions | Visual Inspection will be carried out in accordance with EPA Guidelines on the Storage and Transfer of Materials for Scheduled Activities. |
| Measures to prevent the discharge of aqueous emissions to the environment | A spill kit and suitably sized spill containment barrier will be provided adjacent to the IBC for containing any accidental releases that make their way onto ground and to prevent the run-off of spilled wastewater outside roller doors and into the drainage system serving the business park. | Ongoing | Not Applicable |
| Measures to prevent the discharge of aqueous emissions to the environment | An Emergency Response Procedure comprehensively detailing Spill Response Procedures will be in place. Relevant staff will be trained in these procedures and given training in the use of the spill kit/barrier. | Ongoing/Re-training will be provided on an annual basis | Not Applicable |

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 * |
| Measures to prevent the discharge of aqueous emissions to the environment | Where other chemicals are stored on-site in small quantities (E.g. disinfectant) they will be stored in a cabinet situated in the waste processing area suitable for chemical storage and which offers secondary containment. | Ongoing/ Adherence will be checked on a daily basis | Not Applicable |
| Measures to prevent the discharge of aqueous emissions to the environment | Wastes arriving on-site will be contained in an enclosed sharps bin. Waste handling and storage activities will take place indoors in the processing rooms. No wastes will be handled or stored outside the processing room or outdoors. As such, there will be no possibility of storm water coming into contact with waste being handled or stored at the facility and then being discharged to the environment. | Ongoing/ Adherence will be checked on a daily basis | Not Applicable |
| Noise Control Measures | All waste handling and storage activities will take place indoors in designated areas. | Ongoing/ Adherence will be checked on a daily basis | Not Applicable |
| Infection Control Measures | A Standard Operating Procedure (SOP) has been developed to ensure that waste processing reduces risks associated with infectious materials to negligible to very low levels. Sharps waste arriving on-site will be in UN Approved, sealed, rigid 2.3 litre bins. These bins will be clearly marked with the appropriate label indicating the contents are potentially infectious. Waste bins arriving on-site which are ruptured or which are leaking will be deposited in a quarantine container situated in the | Ongoing/ Adherence will be checked on a daily basis | Not Applicable |

* indicates required field

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| Measure * | Surveillance Measures | | |
|-----------|---|-----------------------------|---------------------|
| | Description * | Frequency of Surveillance * | Method / Standard * |
| | <p>designated waste storage area before being promptly removed off-site.</p> <p>In line with relevant EPA BAT Guidelines SOP's will be developed covering procedures for dealing with accidents, incidents and spillage, e.g., the appropriate first aid measures for sharps injuries, use of spillage kits and disinfectants. A spill response procedure will be in place and a spill kit will be provided on-site to ensure spilled materials are cleaned up safely and effectively, with waste from spill clean-up being deposited in the aforementioned quarantine container. All relevant staff will be provided training and re-training as necessary in operational and health and safety related procedures.</p> <p>Suitable personal protective clothing and equipment will be used by staff who are involved in the handling of waste on-site or who may otherwise carry out work in waste handling, processing or storage areas e.g., cut resistant gloves, cut resistant sleeves, cut resistant apron, leg protectors, cut resistant footwear, face visors. Suitable washing facilities will be provided in the Wash Room for those handling waste. All workers who handle waste arriving on-site or who may otherwise carry out work in waste handling, processing or storage areas will be obliged to undergo</p> | | |

* indicates required field

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| Measure * | Surveillance Measures | | |
|------------------------|---|-----------------------------|---------------------|
| | Description * | Frequency of Surveillance * | Method / Standard * |
| | <p>worker immunisation and regular health monitoring, e.g., for Hepatitis B and tetanus.</p> <p>The designated waste storage area on-site will be clearly marked and delineated. All waste storage containers in this area will be UN Approved and sealable. These containers will also be clearly marked with the appropriate label indicating the contents are potentially infectious.</p> <p>Prior to commencement of operations a Health and Safety risk assessment will be carried out on site to assess the risks to workers associated with facility operations and further identify and clarify the appropriate protection and control measures required. The risk assessment will be reviewed on a yearly basis or where there is a significant process change. The company's Safety Statement will be revised as necessary.</p> | | |
| Odour Control Measures | <p>Sharps waste arriving on-site will only be accepted in sealed sharps waste bin containers. Sharps waste bins should only be opened and sharps waste should only be handled/processed/stored in the designated, enclosed waste processing area. Sharps waste generated in this area will be subsequently transferred to the designated waste storage area and placed in a sealed UN approved container. This</p> | | |

* indicates required field

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| Measure * | Surveillance Measures | | |
|-------------------------|--|--|---------------------|
| | Description * | Frequency of Surveillance * | Method / Standard * |
| | <p>sharps waste will be removed from the premises as soon as practicable when the 770 litre bin is full.</p> <p>A Standard Operating Procedure (SOP) defining safe procedures for processing will be in place. This SOP will explicitly state the requirements for sharps waste to only be handled in the aforementioned designated areas in a tightly controlled manner. All staff involved in the handling and processing of waste arriving on-site will be provided training in this SOP. Regular inspections will take place to ensure adherence to SOP's and to ensure wastes are not being exposed outside designated areas. Sharps waste receptacles contained in the waste processing area will be sealable once full.</p> | | |
| Litter Control Measures | <p>The potential for the generation of litter in or around the site is negligible given the procedures that will be in place for accepting and controlling this waste on-site. All Sharps Waste arriving on-site will be accepted in enclosed, fully sealed bins. These bins will be rigid therefore eliminating the potential for the spill of waste during transportation or on-site handling. Sharps waste will only be handled, processed and stored in designated areas inside the building. Sharps waste arising on-site will be stored in sealable, rigid containers prior to onward transfer.</p> | Ongoing/ Adherence will be checked on a daily basis | Not Applicable |

* indicates required field

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| Measure * | Surveillance Measures | | |
|-------------------------|---|--|---------------------|
| | Description * | Frequency of Surveillance * | Method / Standard * |
| | <p>Waste Acceptance Procedures have been developed to minimize the potential for any unauthorized waste arriving on-site. This ensures the highest level of control possible with regards to waste acceptance and control at the facility. In the highly unlikely event unauthorized waste is deposited into a 2.3 litre sharps bin by a customer and is accepted on-site, this waste will be separated, treated as infectious waste and quarantined in a designated, sealable quarantine container in the processing room inside the building. This waste will ultimately be collected from the premises by an appropriately authorized waste collector for treatment at an appropriate treatment facility. As such, there is no opportunity throughout the process for any litter to be generated inside or in the vicinity of the proposed facility.</p> | | |
| Vermin Control Measures | <p>The potential for the generation of vermin in or around the site is negligible given the procedures that will be in place for accepting and controlling this waste on-site. All Sharps Waste arriving on-site will be accepted in enclosed, fully sealed bins. These bins will be rigid therefore eliminating the potential for the spill of waste during transportation or handling. Sharps waste arriving on-site will only be handled, processed and stored in designated areas inside the building. Sharps waste arising on-site will be stored in sealable</p> | Ongoing/ Adherence will be checked on a daily basis | Not Applicable |

* indicates required field

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| Measure * | Surveillance Measures | | |
|---|--|-----------------------------|---------------------|
| | Description * | Frequency of Surveillance * | Method / Standard * |
| | containers on-site. This 770 litre sharps container will be removed & replaced at the premises by 3 rd party waste license holder when the 770 litre bin is full. | | |
| Development of an Environmental Management System | An Environmental Management System will be developed and implemented to ensure control of environmental aspects and impacts associated with the proposed waste activity | Ongoing | Not Applicable |
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*add rows to the table as necessary

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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): *

It is not envisaged that there will be any possibility for an emergency situation to arise outside of facility operating hours having regard to the nature of the facility and proposed operations.

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) *

No

| Soil Monitoring Point Code | Monitoring Point Grid Ref. | |
|----------------------------|----------------------------|-----------------------|
| | Easting ⁴ | Northing ⁵ |
| | | |
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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 |
|-----------|------|---------------|---------------------------------------|-------------------------------|---------------|-----------------------------|
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*add rows to the table as necessary

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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): *

It is not considered necessary to submit a Costed ELRA for the proposed facility by virtue of the nature and scale of the proposed waste activity and the lack of significant environmental risk associated with the proposed waste activity.

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)

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.

* indicates required field



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Financial Provision Proposal filename:

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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).

It is not considered that

CRAMP filename:

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.

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

[See Below](#)

It is not considered necessary to submit a Costed CRAMP for the proposed facility by virtue of the nature and scale of the proposed waste activity and the lack of potential ongoing environmental liabilities following closure.

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).

A Closure Plan has been developed:

1. To identify and plan for closure tasks and residuals management (i.e. known environmental liabilities) at the time of facility closure and decommissioning, and;
2. To ensure that the necessary measures are taken to prevent environmental pollution occurring at the site during or after closure and decommissioning of the facility.

* indicates required field

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Closure Plan

Roles and Responsibilities

The Operations Director and Environmental, Health and Safety Manager will be the managers responsible for project managing the successful closure and decommissioning of the facility. External Consultants will be procured to assist in managing closure and decommissioning. A team of site operatives will be established to assist with the carrying out of the closure tasks.

Notification of the Authorities

The EPA will be notified of closure of the facility at least 6 months prior to the expected date of closure. Other authorities (e.g. local authority, health and safety authority) will also be notified. In the event of sudden, unexpected closure of the facility due to unforeseen circumstances, the EPA and other relevant authorities will be notified of the closure as soon as practicable.

Documentation Control

All licence documentation which arises during closure and decommissioning of the facility will be held by the company for at least 7 years.

Closure Plan Implementation

Where practicable, in the final period of operation prior to closure, a material management regime will be implemented to ensure that inventories of materials and waste are run down as much as practicable. Once processing has ceased on-site, all residual healthcare waste (I.e. Sharps), disinfectant chemicals, wastewater (stored in the on-site IBC), WEEE, and non-hazardous wastes (I.e. cleaned bin lids, mixed municipal waste, other residual waste) will be collected from the site by authorized waste collectors and sent to appropriate third party authorized waste facilities. The floors, work surfaces and storage areas in the washroom will be thoroughly cleaned and sanitized by facility staff. The passive vent present in the Wash Room will be thoroughly cleaned and sanitized also. The wash unit will preferably be treated as an asset and sold. Where this is not feasible, the wash unit will be treated as WEEE and taken away by an appropriate waste collector for appropriate treatment. Utilities such as electricity supply, gas supply/heating, water supply and wastewater will be shut off as appropriate upon closure and will remain in place as a fixed asset. The building and its rooms will remain in place as a fixed asset. A final visual inspection of the facility will take place to ensure that there are no residual materials or wastes present at the facility. It is envisaged that this Closure Plan will take a maximum of 5 days to complete.

Closure Plan Criteria

The following criteria have been established to set the benchmark for the successful closure of the site:

- All working area on-site should be safely cleaned and sanitized.
- The site and all buildings on-site shall be safely secured from trespassers.

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- All potential health and safety risks on-site should be adequately controlled.
- All plant and equipment remaining on-site as a fixed asset shall be stored on-site in a secure location.
- All hazardous materials or wastes present on-site shall be removed the site.
- All wastes generated during closure should be handled, stored and disposed of/recovered in a manner that complies with regulatory requirements.
- All documentation relating to waste and materials management and removal during the closure process should be retained.
- All documentation relating to plant resale/decommissioning during the closure process should be retained.
- The company shall comply with all the conditions of its Waste Licence during the closure scenario.
- Sufficient funds should be available to cover the full cost of closure
- A Closure Audit should be carried out in accordance with EPA guidelines at the time of closure.
- The EPA should be satisfied that Clean Closure has been achieved on-site.

Closure Plan Validation

Upon completion of closure tasks and programme a suitably qualified and experienced professional should be hired to conduct a validation audit to demonstrate to the EPA that the closure plan has been implemented properly. The scope of the validation audit will be agreed in advance with the EPA and, following approval, the independent auditor will complete the validation audit. The completed validation audit report will be submitted to the EPA for approval. The validation audit shall determine that the criteria for successful closure has been met.

Closure Plan Review

This Closure Plan should be reviewed on an annual basis and updated where there are any significant changes to facility operations.

Emergency Response Procedure

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

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

* indicates required field

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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 | Yes | See Section 9.1 | |
| Fire Control | Yes | Firefighting equipment including various fire extinguishers and a fire blanket is provided on-site. This equipment has been installed by ActFast Fire Ltd. This equipment is serviced on an annual basis. A number of fire extinguishers will be situated both inside and around the Wash Room. A number of fire alarm points are situated on-site in order to ensure the rapid detection of and response to any fire incident. | |
| Dust | No | | |
| Litter | Yes | See Section 9.1 | |
| Birds | No | | |
| Mud | No | | |
| Flies | No | | |
| Vermin | Yes | See Section 9.1 | |
| Other | 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.

* indicates required field



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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:

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State the standard of accreditation achieved:

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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. *

The company propose on implementing the following measures to optimize energy usage at the proposed facility:

- Install LED lights at the company's premises. Investigate the feasibility of installing motion sensor lighting and install if viable.
- Place notices around the premises advising staff to turn PC's, lights and other electrical equipment off when not in use.
- Use laptops over desktop PC's where possible as these use less energy.
- Prevent the use of electrical heaters unless the facility boiler breaks down
- Ensure the proposed wash cycle is optimized to minimize electricity usage associated with this process.
- Ensure the boiler is serviced once a year as required to ensure it operates efficiently.
- Identify how old the existing boiler is. If boiler is greater than 15 years old, it is generally recommended it should be replaced. Investigate the feasibility of doing this with the landlord.
- Investigate the feasibility of installing heating controls in order to optimize energy usage. If installing, erect notice above the central heating control to use hive's/nest's eco mode heating function as much as possible.
- Bleed the radiator system in order to improve efficiency of heating throughout the company's premises

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

| |
|----|
| No |
|----|

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

| |
|----|
| No |
|----|

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

| |
|----------------|
| Not applicable |
|----------------|

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

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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.

9:00 – 17:00 Monday to Friday. No operations will take place on weekends or bank holidays.

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

Not applicable. No construction activities proposed.

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

9:00 – 17:00 Monday to Friday. No waste will be accepted on weekends or bank holidays.

(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 |
|----------------------------|--------------------|----------------------------|-------------|
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*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