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|  <p><b>epa</b><br/>Environmental Protection Agency<br/>An Ghníomhaireacht um Chaomhnú Comhshaoil</p> | <b>OFFICE OF ENVIRONMENTAL SUSTAINABILITY</b>   |
| <b>ENVIRONMENTAL LICENSING PROGRAMME</b>  |   |
| <b>TO:</b>  | Gerard O'Leary, Director  |
| <b>FROM:</b>  | Jim Johnson, Inspector, Environmental Licensing Programme   |
| <b>DATE:</b>  | 12 November 2020  |
| <b>RE:</b>  | Technical Amendment to Industrial Emissions Licence Register Number: W0055-02, held by SRCL Limited, 430 Western Industrial Estate, Naas Road, Dublin 12. |

The Agency received a request on 25<sup>th</sup> Aug 2020 from SRCL Ltd, Licence Reg. No. W0055-02 (IED) to technically amend their Licence. The request relates to a boundary change to reduce the area of the licensed activity.

This memo recommends that the change may be accommodated by a Technical Amendment, in accordance with Section 96(1)(c) of Environmental Protection Agency Act 1992 as amended.

## 1. Background

Sterile Technologies Ireland Limited was granted a licence; Reg. No. W0055-01, on 14<sup>th</sup> Dec 1999 for a facility located at Unit 430, Beech Road, Western Industrial Estate, Naas Road, Dublin 12. The facility was licenced under Section 40(1) of the Waste Management Act, 1996 as amended, to carry out activities 7, 12 and 13 under the Third Schedule of the Act. The facility accepts and treats Healthcare Risk Waste through a sterilisation process involving the application of heat and steam. The waste is then sent off-site for recovery or disposal.

A revised licence, Licence Reg. No. W0055-02 was issued to Sterile Technologies Ireland Limited on 24<sup>th</sup> Jan. 2006. The principal amendments included an increase in tonnage accepted, treatment of additional waste types and a proposal to extend the boundary to include the adjacent unit (420 Beech Road) to operate a waste transfer station there.

The licence (Reg. No. W0055-02) was amended for the purposes of Section 82A(11) of the EPA Act 1992 as amended, on 31<sup>st</sup> Dec 2013. This amendment gives effect to the requirements of Directive 2010/75/EU (Industrial Emissions Directive). The licence, issued to SRCL Ltd, is for the 'disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment' (11.2(b)). Other classes of activity included in the licence are 11.1, 11.2 (d), 11.2 (f), 11.4 (a)(ii), 11.4 (b)(ii) and 11.6.

## 2. Technical Amendment request

On the 25<sup>th</sup> Aug 2020, the Agency received a request for a Technical Amendment of IE Licence Reg. No. W0055-02, in order to change the licence boundary to exclude Unit 420 Beech Road (see map in Appendix 1).

The request was made on foot of an OEE site visit – SV19242 on 16/06/2020. It emerged during the visit that Unit 420 had been returned to the landlord in 2018 and is now occupied by a third party (Campbell Electric Motors). The site visit report of 15<sup>th</sup> July 2020 requested the licensee 'address the licence boundary to exclude Unit 420 Beech Road if applicable'.

### **3. Consultation with the Office of Environmental Enforcement (OEE)**

I have consulted with the OEE Inspector, Lisa Noone, in relation to this Technical Amendment request. OEE has confirmed that there are no legal proceedings in train in respect of this licence.

The OEE comment in relation to the application is as follows: 'Unit 420 (used as office space and parts storage) was returned to the landlord in 2018, licensee has provided a site closure plan. No exit audit required for site as closure plan considered adequate and Unit 420 has been leased to a third party, operated as a garage.'

### **4. Assessment**

The area to be removed from the licence boundary is set out in the figure on page 4 of the Site Closure Plan ('6. Site Plan') (attachment 'SRCL\_BR\_SCP\_420\_') received with the Technical Amendment request on 25<sup>th</sup> Aug 2020 (see Appendix 1).

According to the Site Closure Plan, no waste activities were undertaken in Unit 420. It was primarily used as an office space with storage of small amounts of chemical and oils in bunded areas. These were transferred to Unit 430 along with any equipment and other stock. Before it was handed back the floor of Unit 420 was swept and cleaned with 1% (10,000ppm) sodium hypochlorite solution before being allowed to dry. Inspection of the building was then undertaken by the landlord prior to return.

According to the OEE 'No exit audit required for site as closure plan considered adequate'.

The revision of the licenced boundary will not result in any new or additional emissions. No waste activities were carried out in Unit 420, so there has been no change in emissions at the site.

The site boundary change has been addressed in the TA through amending Condition 1.4.

### **5. Appropriate Assessment**

Appendix 2 lists the European Sites assessed, their associated qualifying interests and conservation objectives.

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activities, individually or in combination with other plans or projects are likely to have a significant effect on any European Site. In this context, particular attention was paid to the European Sites at Glenasmole Valley SAC (001209), Wicklow Mountains SAC (002122), Rye Water Valley/Carton SAC (001398), South Dublin Bay and River Tolka Estuary SPA (004024), South Dublin Bay SAC (000210), and Wicklow Mountains SPA (004040).

The activities are not directly connected with or necessary to the management of any European Site and the Agency considered, for the reasons set out below, that it can be excluded, on the basis of objective information, that the activities, individually or in combination with other plans or projects, will have a significant effect on any European Site and accordingly determined that an Appropriate Assessment of the activities was not required.

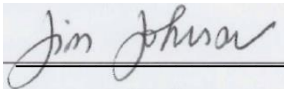
It has been determined that this installation is not likely to have a significant effect on the European Sites as the change does not substantially change the current nature of operations and emissions at the installation.

### **6. Recommendation**

This memo recommends that the requested changes be accommodated by a Technical Amendment of Licence W0055-02 (held by SRCL Ltd), in accordance with Section 96(1)(c) of the EPA Act 1992 as amended.

I recommend that the licence amendment be approved as set out in the attached recommended Technical Amendment. The making of the amendment will not result in the relevant requirements of Section 83(5) of the EPA Act 1992 as amended, ceasing to be satisfied.

Signed,

A handwritten signature in cursive script, appearing to read "Jim Johnson", is written over a horizontal line. The signature is contained within a light grey rectangular box.

Inspector  
Environmental Licensing Programme

## Appendix 1

Area of Land being removed highlighted in red, revised boundary shown in green. [From Site Closure Plan]

The image displays an aerial map of an industrial site with several units. Unit 420 is highlighted in red, and Unit 430 is outlined in green. A yellow highlighted area surrounds the units. The map includes a zoom control on the left and a metadata box in the bottom-left corner. A sidebar on the right provides 'Property Details' for Unit 420.

**Map Metadata:**

|          |                |
|----------|----------------|
| XY       | 708933, 731475 |
| Scale    | 1 : 1000       |
| Townland | Redcow         |
| Barony   | Uppercross     |
| County   | Dublin         |

**Property Details:**

|                                |   |
|--------------------------------|---|
| Folio Number                   | DN17085F  |
| Title Level                    | Freehold  |
| Plan Number                    | 63  |
| Property Number                | 1   |
| Area of selected plans         | 0.14 hectares.  |
| Number of Plans on this folio: | 1   |
| Address                        | Campbell Electric Motors Ltd., Unit 420, Beech Road, Western Industrial Estate, Dublin 12, D12 DE00 |

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**\*PRA Boundaries and Plan Area are not conclusive. See [Section 62\(2\) of Registration of Title Act 2006](#) and [Rule 8\(3\) of the Land Registration Rules 2012](#).**

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**Appendix 2: List of European Sites assessed, their associated qualifying interests and conservation objectives.**

| Site Type | European Site (site code)      | Distance/ Direction from installation | Qualifying Interests (* denotes a priority habitat)   | Conservation Objectives  |
|-----------|--------------------------------|---------------------------------------|---|--|
| 1         | Glenasmole Valley SAC (001209) | 7 km south of the installation        | <p><b>Habitats</b><br/>                     6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)<br/>                     6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)<br/>                     7220 Petrifying springs with tufa formation (Cratoneurion)*<br/>                     * denotes a priority habitat</p>  | As per NPWS (2020) Conservation objectives for Glenasmole Valley SAC [001209]. Generic Version 7.0. Department of Culture, Heritage and the Gaeltacht.   |
| 2         | Wicklow Mountains SAC (002122) | 9.4 km south of the installation      | <p><b>Habitats</b><br/>                     3110 Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae)<br/>                     3160 Natural dystrophic lakes and ponds<br/>                     4010 Northern Atlantic wet heaths with Erica tetralix<br/>                     4030 European dry heaths<br/>                     4060 Alpine and Boreal heaths<br/>                     6130 Calaminarian grasslands of the Violetalia calaminariae<br/>                     6230 Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)*<br/>                     7130 Blanket bogs (* if active bog)<br/>                     8110 Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani)<br/>                     8210 Calcareous rocky slopes with chasmophytic vegetation<br/>                     8220 Siliceous rocky slopes with chasmophytic vegetation<br/>                     91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles</p> <p><b>Species</b><br/>                     1355 Otter (<i>Lutra lutra</i>)</p> | As per NPWS (2017) Conservation Objectives: Wicklow Mountains SAC 002122. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs. |

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| 3 | Rye Water Valley/Carton SAC (001398)                  | 9.6 km northwest of the installation | <p><b>Habitats</b><br/>7220 Petrifying springs with tufa formation (Cratoneurion)*</p> <p><b>Species</b><br/>1016 Desmoulin's Whorl Snail (<i>Vertigo moulinsiana</i>)<br/>1014 Narrow-mouthed Whorl Snail (<i>Vertigo angustior</i>)</p> <p>* denotes a priority habitat</p>  | As per NPWS (2020) Conservation objectives for Rye Water Valley/Carton SAC [001398]. Generic Version 7.0. Department of Culture, Heritage and the Gaeltacht.                                     |
| 4 | South Dublin Bay and River Tolka Estuary SPA (004024) | 9.8 km west of the installation      | <p><b>Birds</b><br/>A144 Sanderling (<i>Calidris alba</i>)<br/>A157 Bar-tailed Godwit (<i>Limosa lapponica</i>)<br/>A149 Dunlin (<i>Calidris alpina</i>)<br/>A162 Redshank (<i>Tringa totanus</i>)<br/>A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>)<br/>A143 Knot (<i>Calidris canutus</i>)<br/>A192 Roseate Tern (<i>Sterna dougallii</i>)<br/>A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>)<br/>A141 Grey Plover (<i>Pluvialis squatarola</i>)<br/>A130 Oystercatcher (<i>Haematopus ostralegus</i>)<br/>A194 Arctic Tern (<i>Sterna paradisaea</i>)<br/>A193 Common Tern (<i>Sterna hirundo</i>)<br/>A137 Ringed Plover (<i>Charadrius hiaticula</i>)</p> <p><b>Habitats</b><br/>Wetlands</p> | As per NPWS (2015) Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht. |
| 5 | South Dublin Bay SAC (000210)                         | 10 km west of the installation       | <p><b>Habitats</b><br/>1140 Mudflats and sandflats not covered by seawater at low tide<br/>1210 Annual vegetation of drift lines<br/>1310 Salicornia and other annuals colonising mud and sand<br/>2110 Embryonic shifting dunes</p>   | As per NPWS (2013) Conservation Objectives: South Dublin Bay SAC 000210. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.                         |
| 6 | Wicklow Mountains SPA (004040)                        | 10.2 km south of the installation    | <p><b>Birds</b><br/>A098 Merlin (<i>Falco columbarius</i>)<br/>A103 Peregrine (<i>Falco peregrinus</i>)</p>  | As per NPWS (2020) Conservation objectives for Wicklow Mountains SPA [004040]. Generic Version 7.0. Department of Culture, Heritage and the Gaeltacht.   |