



01/04/2021

Reg. No.: W0308-01

Ref: HealthBeacon Response to EPA Letter 2 - dated 18/3/2021.

Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations 2004 as amended, in respect of a licence application from HealthBeacon Limited for a facility located at HealthBeacon Limited, Unit 18, Naas Road Business Park, Muirfield Drive, Naas Road, Dublin 12, D12 PF63

As requested, please find further information on requirements below and in the accompanying documentation.

ARTICLE COMPLIANCE REQUIREMENTS

1. *"The application refers to the proposed storage of waste at the facility. Confirm all classes of activity proposed at the facility in accordance with the Third and Fourth Schedule of the Waste Management Act 1996 as amended. Also, confirm the principal activity proposed at the facility."*

The class of activity at the site, as specified in the Fourth schedule of the Waste Management Act 1996, as amended, are as follows:

Principal Activity

Class R12 exchange of waste for submission to any of the operations numbered R1 to R11 (if there is no other R code appropriate, this can include preliminary operations prior to recovery including pre-processing such as, amongst others, dismantling, sorting, crushing, compacting, pelletising, drying, shredding, conditioning, repackaging, separating, blending or mixing prior to submission to any of the operations numbered R1 to R11.

Other Activities

R 13 Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced)

In brief, the principal activity (R12) will be the exchange or transfer of manufacturer/brand autoinjector or syringe waste from a small 2.3 litre container to a larger 22 litre container for the purposes of calculating the exact weight of waste produced. The smaller containers will then be washed to allow reuse. The 22 litre container will then be transferred to a 770 litre container, which, when full, or within 3 months, will be collected by Stericycle (430 Beech Rd, Naas Rd, Western Industrial

Estate, Dublin (SRCL)) - for activity R1 (waste to energy). Note: HealthBeacon will not undertake this activity (R1).

2. *"The grid reference provided in the newspaper notice for the facility appears to be incorrect. Confirm the national grid reference for the facility (Irish National Grid format, 6 digits Easting, 6 digits Northing)"*

The National Grid reference for Unit 18 is Easting (311107) and Northing (232278) showing a pin directly outside (and within the building footprint) Unit 18 Naas Road Business Park, Muirfield Drive, Dublin 12. The newspaper and site notices have been updated and published accordingly and are uploaded as part of this info pack.

3. *"The newspaper notice provided with the application states that "The waste being used sharps may be described as in EWC (European Waste Catalogue) under codes 180101 & 180103", however, only the list of waste (LoW) code 18 01 03* is proposed for acceptance in the application. Confirm the LoW codes for all proposed wastes to be accepted at the facility. A proposed quantity (tonnes per annum) for each waste type should also be provided"*

The correct EWC code is: 180103 and both newspaper and site notices have been updated accordingly and published. The quantity of 180103 that will be accepted to the facility will be 20 tonnes per annum.

4. *"The notice issued to the planning authority, as provided in attachment 6-7-4 of the application, does not meet the requirements of article 9 of the Waste Management (Licensing) Regulations 2004 as amended (hereafter referred to as 'the Regulations'). Submit a copy of a revised notice given to the relevant planning authority which fully complies with article 9 of the Regulations, in accordance with article 12(4)(c) of the Regulations"*

See "Attachment 6-7-4-Notice to PA of Application-01-04-21" which conforms to article 9 of the Waste Management Regulations 2004. This has been submitted to the Planning Authority.

5. *"Provide a detailed layout drawing of the facility, which indicates at minimum the waste storage and quarantine areas, wash area and the waste water storage area"*

See "Attachment-4-3-1-Storage of Waste-01-April-21" for detailed drawing.

6. *"Provide details of the type of washing unit proposed for the facility. Provide an estimate of the quantity of wastewater to be generated from the washing unit"*

The washing unit is a Bosch Serie 6, integrated dishwasher # SMV68MD00G/63. The unit uses 7.5 litres of water per wash. At facility capacity the machine being used 2000 times would generate 15,000 litres of water per annum.

7. *"Describe the process by which the wastewater IBC(s) will be delivered to and removed from the facility"*

The IBC container collects all water discharged from the Bosch washer and the wash basin in the process room. Each wash is logged and container inspected on a daily basis. When the IBC container reaches capacity it is collected by Enva (Greenogue Business Park, Rathcoole, Co Dublin) as follows:

1. Truck arrives to the facility and parks beside roller shutter door at rear of the facility to access the IBC container.
 2. An empty IBC container is removed from the truck.
 3. The full IBC container is disconnected from the outlet pipe and capped.
 4. The driver utilises a pallet truck to maneuver the full container out of unit 18. He replaces this with the empty container.
 5. The full IBC is lifted onto the truck. The truck leaves the facility.
 6. The outlet pipe is connected and secured. A check on piping connection and outlet valve is completed.
8. *"Confirm how wastewater from the onsite canteen and toilets will be managed at the facility"*

Wastewater from canteen and toilet is discharged into the onsite business park drainage system as serviced by Dublin City Council.

9. *"The application states that the facility will be heated by a gas boiler. Provide details of the proposed annual gas usage at the facility"*

There are no gas boilers at the unit 18 facility. The facility is heated by overhead heaters that are run on electricity. Annual usage is currently at 22,139 kWh (2020 usage), and it is expected that the facility will add an additional 15% electricity usage of 3320 kWh, for a total usage of 25,460 kWh.

10. *"Confirm the number of employees to be employed at the facility"*

There will be an additional 2 employees when the facility is at capacity.

11. *"The application does not address the potential of fire risk at the facility. Provide details of the potential for fire risk at the facility as well as the measures to prevent the risk of fire and the measures for the minimisation of any accidental emissions as a result thereof"*

HealthBeacon's Staff Handbook, clearly outlines Fire Safety guidelines and measures for the facility as well as procedures in the event of a fire.

In addition, a risk assessment of the new facility has been carried out and determined that it does not increase the overall risk for a fire at the site. A number of fire prevention measures and procedures are in place including an Orion fire alarm system with detectors throughout unit 18 and also fitted in the HB green (process and clean) labs. In addition, portable fire extinguishers are fitted throughout the facility certified to ISO 291:2015 and regular staff training on fire prevention and safety is carried out. The detergent used in the washing process has been assessed for fire risk potential and poses no additional flammability risk.

The company's fire safety procedure included in the staff handbook (QP-0045-02) and evacuation procedures (QP-0042) and are made available to all employees. It is company policy that all electrical appliances be checked for damage prior to use and that any damage noticed is immediately reported even if minor and that damaged equipment is not to be used.

The HB green labs facility itself will contain maintenance and incident logs to ensure equipment is checked regularly for faults and that these are flagged for immediate action.

12. *"In addition to the above, please also [provide](#) an updated non-technical summary (Application Form, and EIS where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary."*

The non-technical summary has been updated to reflect the above amendments and is attached "Attachment-1-1-1 Non-technical Summary-01-April-21"

Please let us know if further clarity on any of these items are required.

Sincerely

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