

Baseline Screening Report for application to review Licence number

P0790-03

Introduction

Section 12 of the Industrial Emissions licence Application Form states that in the case of an activity that involves the use, production or release of hazardous substances (as defined in section 3 of the EPA Act 1992 as amended), and having regard to the possibility of soil and groundwater contamination at the site of the installation, provide a baseline report in accordance with section 868 of the EPA Act 1992 as amended.

The European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions identifies eight stages in producing a baseline report. The eight stages cover the following main elements; stages one to three decide whether a baseline report is required, stages four to seven determine how a baseline report has to be prepared and stage eight determines the content of the report. The European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions states that where during stages one to three of producing a baseline report it is demonstrated on the basis of the available information that a baseline report is not required, there is no need to progress to the later stages. The proposed activity to which this application relates will involve the use of three hazardous substances and will not involve the production or the release of any hazardous substances.

Stage 1

The European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions (2014/C 136/03) sets out that stage one of preparing a baseline report must identify which hazardous substances are used produced or released at the installation and produce a list of these hazardous substances. The objective of this procedure is to determine whether or not hazardous substances are used, produced or released in view of deciding on the need to prepare and submit a baseline report. There are no hazardous substances produced or released from the existing site. There will not be any hazardous substances produced or released from the proposed activity. There are 3 hazardous substances as defined within Article 3 of Regulation (EC) No 1272/2008 that are used on the existing site the substances in question are

- Diesel/ Heating Oil
- Fluorescent lights
- Hyperox Disinfectant (Or similar)

Diesel/ Heating Oil, fluorescent lights and Hyperox Disinfectant will continue to be used on site for the proposed activity.

Stage 2

The hazardous substances identified in stage one of the baseline report are both relevant hazardous substances as defined in Section 4.2 of the European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions (2014/C 136/03).

The objective of this stage of the report is to restrict further consideration to only the relevant hazardous substances in view of deciding on the need to prepare and submit a baseline report. Details of the hazardous substances to be used in the proposed activity are listed below.

1. Fluorescent Lights

Fluorescent light tubes contain mercury EC No. 231-106-7 which is listed as a hazardous substance under Article 3 of Regulation (EC) No 1272/2008.

2. Diesel/ Heating Oil

Diesel EC No. 302-695-9 is listed as a hazardous substance under article 3 of Regulation (EC) No 1272/2008.

3. Hyperox Disinfectant (or similar)

Containing a mixture of Peracetic acid EC No. 201-186-8 and Hydrogen peroxide EC-No.231-765-0, these are listed as a hazardous substance under Article 3 of Regulation (EC) No 1272/2008)

Stage 3

In stage 3 the relevant hazardous substances brought forward from Stage 2 must be documented in terms of the actual possibility for soil or groundwater contamination at the site of the installation including the probability of releases and their consequences. The following factors will need to be taken into account

- The quantities of each hazardous substance or groups of similar hazardous substances concerned;
- How and where hazardous substances are stored, used and to be transported around the installation;
- Where they pose a risk to be released;
- In case of existing installations also the measures that have been adopted to ensure that it is impossible in practice that contamination of soil or groundwater takes place.

The objective of stage three is to identify which of the relevant hazardous substances represent a potential pollution risk at the site based on the likelihood of releases of such substances occurring. Information must be included in the baseline report for any such substances.

1. Fluorescent light tubes

Fluorescent light tubes will be used for lighting throughout the installation. The expired fluorescent light tubes will be carefully removed by the licensee and placed directly into an impervious container.

The impervious container will be carried to a designated store area with a concrete floor. The impervious storage container containing the used fluorescent tubes will be transported by van at regular intervals (when there is 25 expired fluorescent light tubes to be disposed) to the local civic amenity site. The used fluorescent tubes will be placed in the designated coffin at the civic amenity site.

These are the measures that have been adopted at the existing installation to ensure that it is impossible in practice that contamination of soil or groundwater takes place. These measures will continue to be implemented on the activity proposed on this licence review application.

2. Diesel/ Heating Oil

Diesel will be stored on site for use in the onsite tractor, fuel for onsite boiler and also as a fuel source for the backup electricity generator. There will be 2 Fuel tanks onsite. Fuel tank for boiler will have a capacity of 2,275 litres and fuel tank for generator will have a capacity of 1280 litres. The diesel storage tanks will be double skinned in order to prevent leakage.

The diesel tank will be stored on a bunded area of impervious concrete. A supply of absorbent material will be stored on site to be used to soak up diesel in the event of a spillage to the bunded area.

In the event of a spillage to the bunded area taking place the used absorbent material will be removed to the local civic amenity site.

These are the measures that have been adopted at the existing installation to ensure that it is impossible in practice that contamination of soil or groundwater from diesel takes place. These measures will continue to be implemented on the activity proposed on this licence review application.

3. Hyperox Disinfectant (Or Similar)

This will be store in 20L containers in a designated storage area, which has an impervious floor and will be protected from Damage. Container is not moved on a regular bases as it is only stored for cleaning use only. The Maximum quantity stored on site will be up to 60 litres at any one time.

Conclusion

The proposed activity will not involve the production or release of any hazardous substances. Stages one to three of the baseline screening report for the proposed activity outlines how three relevant hazardous substances are used and stored on site.

The procedures adopted for usage of the relevant hazardous substances and the impervious storage areas used for them ensure that there is no potential pollution risk to either soil or groundwater at the site.

The measures will continue to be enforced with the proposed activity and will make it impossible for contamination of soil or groundwater to occur. It is for this reason that it is considered that a baseline report is not required.