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Mr. Garrett Leech

On behalf of Bord Na Móna Recycling Limited

24 May 2022

Reg. No.: W0240-02

Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations, in respect of a licence review from Bord Na Móna Recycling Limited for a facility located at Bord Na Móna Recycling Limited, Solsborough, Springfort Cross, Nenagh, Tipperary, E45EH57

Dear Sir,

I refer to the application for a licence received by the EPA on 24 October 2018.

Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with the above mentioned legislation. You are therefore requested, in accordance with the regulations, to supply the information detailed below.

1. Clarify whether waste stored at the facility is sent onwards for incineration or co-incineration. If yes, state the capacity of the facility (tonnes per day) for this activity and state whether it exceeds the capacity threshold, of over 75 tonnes per day, of class 11.4(b)(ii) of the EPA Act 1992, as amended (Article 12(1)(o)).
2. Clarify if any hazardous waste is proposed to be accepted at the facility, for example, hazardous waste electrical and electronic equipment (WEEE) (Article 12(1)(g). If hazardous waste is proposed to be accepted at the facility, provide details of:
 - (a) The relevant List of Waste (LoW) code(s),
 - (b) Whether the capacity exceeds 10 tonnes per day involving one or more of the activities specified in Class 11.2 of the EPA Act 1992 as amended and
 - (c) The total capacity of hazardous waste stored at any one time at the facility and whether the total capacity exceeds 50 tonnes for temporary storage of hazardous waste, as specified in class 11.6 of the EPA Act 1992 as amended.
3. Confirm if all LoW codes proposed to be accepted at the facility under the review are included in the table entitled "*List of Wastes by R&D Code and Treatment Type*", provided on page 15 of attachment "*Application Form - Application Form* -

Application Form - LA001648" of the application form. Amend the table as needed (Article 12(1)(g)).

4. Complete the following table, in accordance with Article 12(1)(g);

	Tonnage per annum (tpa) currently accepted	Tpa proposed to be accepted under the review
Municipal (LoW code 20 XX XX)		
Construction and Demolition (LoW code 17 XX XX)		
Other LoW codes		

5. In accordance with Article 12(1)(g);

- (a) Identify the LoW codes currently accepted onsite which are proposed to be increased under the review and state the increased waste acceptance tonnages.
- (b) Identify any new LoW codes to be accepted under the review and the proposed tonnage(s).

6. Identify all mitigation measures proposed following the increase in waste acceptance (Article 12(1)(l));

- (a) to prevent potential odour emissions from the storage and processing of municipal wastes, and
- (b) to prevent potential dust emissions from the storage and processing of construction & demolition waste.

7. State which wastes are accepted at the civic amenity facility and for each waste, explain the storage measures implemented to mitigate against potential emissions (Article 12(1)(l)).

8. State what waste(s) (including LoW code) are stored, or are proposed to be stored, outside and explain the mitigation measures proposed to prevent potential emissions (Article 12(1)(l)).

9. Confirm whether the following waste activities, authorised under the existing licence, are proposed to be carried out under the review, in accordance with Article 12(1)(i);

- (a) shredding of waste,
- (b) crushing of waste,

- (c) bailing of wastes, or
- (d) sorting and/or blending of construction and demolition waste.

10. Provide a site drainage map with labelled emission point(s) and monitoring/sampling point(s) for the following emissions, in accordance with Article 12(4)(d);

- (a) storm water, and
- (b) sewer.

11. It is noted that the co-ordinates provided as part of the application for storm-water and sewer monitoring, respectively, do not match the locations observed onsite. Provide up-dated co-ordinates, in accordance with Article 12(1)(m).

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

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Your response to this request is to be submitted via EDEN. Guidance on how to use this portal is available on the EPA website at [IE Licence application guidance | Environmental Protection Agency \(epa.ie\)](#)

Please direct any queries to licensing@epa.ie.

Yours faithfully,



Environmental Licensing Programme
Office of Environmental Sustainability
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