



**Barna Recycling Carrowbrowne
EPA Licence W106-02
Screening for Baseline Report**



PROJECT NAME

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1.0 INTRODUCTION

A technical amendment to the boundary is proposed for the EPA licence facility - W106-02. The site is operated by Barna Recycling. In accordance with the requirements of Article 22 of the Industrial Emissions Directive (IED) (2010/75EU), this Baseline Report has been prepared.

As per Article 22(2) of the Directive:

“Where the activity involves the use, production or release of relevant hazardous substances and having regard to the possibility of soil and groundwater contamination at the site of the installation, the operator shall prepare and submit to the competent authority a baseline report before starting operation of an installation or before a permit for an installation is updated for the first time after 7 January 2013”.

The European Commission has adopted a Communication on the elaboration of baseline reports under Article 22(2) of the IED ¹. The European Commission Guidance has been followed in the preparation of this report.

1.1 EUROPEAN COMMISSION GUIDANCE

The EC guidance identifies key tasks that should be undertaken to both determine whether a baseline report needs to be produced for a particular situation and in order to produce the baseline report itself.

Eight stages have been identified in this process, covering the following main elements:

- Stages 1-3: to decide whether a baseline report is required;
- Stages 4-7: to determine how a baseline report has to be prepared; and
- Stage 8: to determine the content of the report.

These stages are outlined further in the guidance document (Table 5.1) which is reproduced in Table 1.1 below. This Baseline Report has been produced following each of the required stages from the guidance.

¹ European Commission (EC), *Communication from the Commission – European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions* (2006)

Table 1-1 Main Stages of Preparing the Baseline Report

Stage	Activity	Objective
1	Identify which hazardous substances are used, produced, or released at the installation and produce a list of these hazardous substances.	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.
2	Identify which of the hazardous substances from Stage 1 are 'relevant hazardous substances' (see Section 4.2 (of EC Guidance)). Discard those hazardous substances that are incapable of contaminating soil or groundwater. Justify and record the decisions taken to exclude certain hazardous substances.	To restrict further consideration to only the relevant hazardous substances in view of deciding on the need to prepare and submit a baseline report.
3	<p>For each relevant hazardous substance brought forward from Stage 2, identify the actual possibility for soil or groundwater contamination at the site of the installation, including the probability of releases and their consequences, and taking particular account of:</p> <ul style="list-style-type: none"> - 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. 	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. For these substances, information must be included in the baseline report.
4	Provide a site history. Consider available data and information:	Identify potential sources which may have resulted in the hazardous substances identified in Stage 3 being already present on the site of the installation.

Stage	Activity	Objective
	<ul style="list-style-type: none"> - In relation to the present use of the site, and on emissions of hazardous substances which have occurred, and which may give rise to pollution. In particular, consider accidents or incidents, drips or spills from routine operations, changes in operational practice, site surfacing, changes in the hazardous substances used. - Previous uses of the site that may have resulted in the release of hazardous substances, be they the same as those used, produced or released by the existing installation, or different ones. <p>Review of previous investigation reports may assist in compiling this data</p>	
5	<p>Identify the site's environmental setting including:</p> <ul style="list-style-type: none"> - Topography; - Geology; - Direction of groundwater flow; - Other potential migration pathways such as drains and service channels; - Environmental aspects (e.g., particular habitats, species, protected areas etc.); and - Surrounding land use. 	<p>Determine where hazardous substances may go if released and where to look for them. Also identify the environmental media and receptors that are potentially at risk and where there are other activities in the area which release the same hazardous substances and may cause them to migrate onto the site.</p>
6	<p>Use the results of Stages 3 to 5 to describe the site, in particular demonstrating the location, type, extent and quantity of historic pollution and potential future emissions sources noting the strata and groundwater likely to be affected by</p>	<p>Identify the location, nature, and extent of existing pollution on the site and to determine which strata and groundwater might be affected by such pollution. Compare with potential future emissions to see if areas are coincident.</p>

Stage	Activity	Objective
	those emissions – making links between sources of emissions, the pathways by which pollution may move and the receptors likely to be affected.	
7	If there is sufficient information to quantify the state of soil and groundwater pollution by relevant hazardous substances on the basis of Stages (1) to (6) then go directly to Stage 8. If insufficient information exists, then intrusive investigation of the site will be required in order to gather such information. The details of such investigation should be clarified with the competent authority.	Collect additional information as necessary to allow a quantified assessment of soil and groundwater pollution by relevant hazardous substances.
8	Produce a baseline report for the installation that quantifies the state of soil and groundwater pollution by relevant hazardous substances.	Provide a baseline report in line with the IED.

The EC guidance document also provides the following direction on whether or not a baseline report is required:

- Where it is apparent that due to the quantities of the hazardous substances used, produced, or released at the installation, or due to the soil and groundwater characteristics of the site there is no significant possibility for contamination of soil or groundwater, then a baseline report is not required;
- In case of existing installations, where measures are taken which make it impossible in practice that contamination of soil or groundwater occurs, a baseline report is also not required; and
- Where, as a result of this stage, it is considered that a baseline report is not required it is still expected that a record of such a decision, including the reasons for the decision, will be made by the operator, and further assessed and held by the competent authority.

2.0 STAGES 1-3: TO DECIDE WHETHER A BASELINE REPORT IS REQUIRED

2.1 STAGE 1: IDENTIFYING THE HAZARDOUS SUBSTANCES THAT ARE CURRENTLY USED, PRODUCED OR RELEASED AT THE INSTALLATION

There are no hazardous materials that are proposed for use at the proposed extension of the EPA Waste Licence Boundary W106-02. There is no fuel stored on site.

The proposed boundary extension comprises a storage area for inert C&D waste, offices and ancillary buildings. The site is hard covered.

Drawing No. 1015-2620 shows the proposed new EPA site boundary which is being extended by 1.21 ha to include the area to the West of the main site as a waste sorting and management area.

This area will not include any new activity it will facilitate extra space to allow an existing process from the licenced site be carried out in a larger and more efficient area.

The primary use will simply be for the sorting of skip waste currently carried out in section 1 and essentially waste will be delivered and sorted here before being returned to the main building for baling, shredding or storing. In addition, this area will facilitate storage bays in the outside area for other solid materials with no odour.

There are no emissions proposed from any of these processes and no shredding or screening is proposed in the outside areas.

2.2 STAGE 2: IDENTIFYING THE RELEVANT HAZARDOUS SUBSTANCES

This stage of the process is required to determine the potential pollution risk of each hazardous substance by considering its chemical and physical properties. **In the case of this report, there are no hazardous materials. As a result, this section is not applicable.**

2.3 STAGE 3: ASSESSMENT OF THE SITE-SPECIFIC POLLUTION POSSIBILITY

This section brings forward the relevant substances identified in Stage 2 above which must be considered in the context of the site to determine whether circumstances exist which may result in the release of the substance in sufficient quantities to represent a pollution risk, either as a result of a single emission or as a result of accumulation from multiple emissions. **Due to absence of hazardous materials within the proposed extension this section is not applicable.**

2.4 SUMMARY OF STAGES 1-3

In accordance with the EC Guidance, there are no potential contaminants that present a risk of contamination of soil or groundwater. **On this basis, the completion of Stages 4-8 is not required, and a full Baseline Report is not required.**

3.0 CONCLUSION

This Screening for Baseline Report has been carried out in accordance with EC Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU (Industrial Emissions Directive).

Stages 1-3 of the guidance are set out in this report. There are no hazardous materials that are proposed for use at the proposed extension of the EPA Waste Licence Boundary. As a result, this screening has determined that because of the fact that no hazardous substances have been identified, there are no substances that are considered to present a risk of contamination of soil or groundwater. **On this basis, the completion of Stages 4-8 is not required, and a full Baseline Report is not required.**

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