



Annual Environmental Report (AER) 2021

Company Name: Irish Cement Limited – Limerick Works

Licence Number: P0029-06

Address: Castlemungret, Co. Limerick

Class of Activity¹: 10

¹ See Appendix I

Purpose of this Report

One of the functions of the Environmental Protection Agency (EPA) is to licence and regulate the activities² of large scale industrial (e.g. chemical, food processors, power plants) and waste facilities. Submitting an Annual Environmental Report (AER) is a requirement of all EPA licences.

An AER is a public document. To this end, this format has been developed for industrial and waste licence holders (other than the intensive agriculture sector) to use as a template. This is to assist any member of the public to interpret and understand the environmental performance of the licensed facility.

The AER is a **summary** of environmental information for a given year. It includes:

- Details of the licence holder’s environmental goals achieved, goals to maintain compliance and/or improve their environmental performance;
- Answers to questions regarding their facility’s activities;
- Tables of results from monitoring emissions such as air, water, noise, and odour; and
- Details of waste generated, accepted and treated.

An AER does **not** provide detailed technical data. Such information is available in three ways:

- 1) Contacting the licence holder directly. The Contact Us section of this template enables the licence holder to provide details of where a member of the public can obtain further information on topics reported in this document.

² See Appendix I

- 2) Some documents³ are available on the EPA website via the licence details page for each individual licence. This can be found by browsing either the <http://www.epa.ie/licensing/> or <http://www.epa.ie/enforcement/> pages of the EPA website.
- 3) All formal enforcement correspondence exchanged between the EPA and a licence holder during the regulatory process is available for public viewing by appointment at any EPA Office.

If you have a question or query about an AER or an individual EPA licensed facility see the EPA's website or contact the relevant EPA office. See <http://www.epa.ie/about/contactus/> for contact details.

³ This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

Contents

Glossary	5
Declaration	8
1) Introduction	9
Contact Us	9
2) How we Manage our Facility	11
Environmental Management System	11
Beyond Compliance	14
3) Energy & Water	15
Energy	15
Water	17
4) Environmental Complaints	18
5) Environmental Incidents	20
6) Our Environmental Emissions	23
Storm Water	24
Waste Water	27
Air	29
Fugitive Solvent Emissions	33
Groundwater	34
Noise	36
7) Waste	38
Waste Generated	38
Waste Accepted	40
8) Financial Provision	41

Glossary

Abatement Equipment	Technology used to reduce pollution
AER	Annual Environmental Report.
Beyond Compliance	Beyond compliance is concept to help deliver greater organisational performance and long-term value for the environment, society and the economy.
CRAMP	Closure, Restoration and Aftercare Management Plan.
ELRA	Environmental Liability Risk Assessment.
Emission Limit Value	Limits set for specified emissions, typically outlined in Schedule B of an EPA licence.
EMS	Environmental Management System.
Environmental Goal	An objective or target set by a licensee as part of an environmental management system (EMS).
Environmental Pollutant	Substance or material that due to its quantity and/or nature has a negative impact on the environment.
Facility	Any site or premises that holds an EPA industrial or waste licence.
FP	Financial Provision.
GJ	Giga joules, an international unit of energy measurement.

Groundwater	All water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.
Incident	As defined by an EPA industrial or waste licence.
Inert Waste	Is waste that will not undergo physical, chemical or biological change thereby, is unlikely to cause environmental pollution or harm human health.
List of Wastes (LoW)	A list of wastes drawn up by the European Commission and published as Commission Decision 2014/955/EU.
Noise Sensitive Location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other installation or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Non-Renewable Resource	A resource of economic value that cannot be replaced at the same rate it is being consumed e.g. coal, peat, oil and natural gas.
Oil Separator	Separator system for light liquids (e.g. oil and petrol).
PRTR	Pollutant Release and Transfer Register.
Renewable Resource	Wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.
Sanitary Waste	Waste water from toilet, washroom and canteen facilities.

Storm Water	Rain water run-off from roof and non-process areas.
Surface Water	Lakes, rivers, streams, estuaries and coastal waters.
Trigger Level	A value set for a specific parameter, the achievement or exceedance of which requires certain actions to be taken by the licence holder.
Volatile Organic Compounds	Gases produced from solids or liquids that evaporate readily in ambient conditions.
Waste	Any substance or object which the holder discards or intends or is required to discard.

Disclaimer

These are **not** legal definitions. Legal definitions can be found in the corresponding legislation.

Declaration

I, Eve Howard, Environmental Manager confirm that by ticking the box below, all information in this report is truthful and accurate to the best of my knowledge and belief.

In addition, I confirm that all monitoring and performance reporting required by our EPA licence and summarised herein is available for inspection by the EPA.

Tick here



1) Introduction

See below a brief description of our facility and a summary of our environmental performance this year.

The cement manufacturing process which is carried out at Limerick Works can be broken down into the following main sections:

1. Quarrying and storage of raw materials for the process.
2. Raw material analysis and blending.
3. Milling of raw materials to produce raw meal.
4. Pyro processing of raw material to produce clinker.
5. Clinker cooling and storage.
6. Addition of small amounts of additives and milling of the clinker to produce cement.
7. Storage and dispatch of cement powder.

Irish Cement is committed in maintaining a high level of environmental compliance.

There were no significant structural changes to the plant throughout the course of the year.

There was an increase in production in 2021 versus 2020 due to reduced production in 2020 because of the Covid 19 pandemic.

Contact Us

If you have any questions or would like further information on any aspect of our licensed activity, please contact us directly.

See below details:

Irish Cement Ltd,
Limerick Works,
Castlemungret,
Co. Limerick.
P: + 353 61 487 200
E: info@irishcement.ie

2) How we Manage our Facility

Environmental Management System

Explanation

To ensure our facility's activities do not cause environmental pollution we are required to have detailed documentation systems in place to help us manage and track our environmental performance. These systems are referred to as Environmental Management Systems (EMS). We review our EMS every year and set up-to-date **environmental goals** to continually improve our environmental performance.

The information below sets out the environmental goals for our facility to help us prevent environmental pollution and reduce our impact on the environment. Target dates for completing each goal and progress towards achieving the goal are outlined in Table 1.

Table 1 Environmental Goals

Environmental Goal	Target Date	Progress
Improve management of waste onsite	2021/2022	Complete 2021/On-going 2022
Maintenance of bag filters to optimise performance	2021/2022	Complete 2021/On-going 2022
Monitoring and quantification of fugitive dust emissions from site & continued practices to mitigate this dust	2021/2022	Complete 2021/On-going 2022
Cooler maintenance & replacement programme	2021/2022	Complete 2021/On-going 2022
Clinker pan maintenance & replacement programme	2021/2022	Complete 2021/On-going 2022

Monitoring of all over ground pipe work, integrity testing underground pipework	2021/2022	Complete 2021/On-going 2022
Monitoring and quantification of noise emanating from site and continued practices to minimise the noise	2021/2022	Complete 2021/On-going 2022
Implementation of numerous mitigation measures to reduce noise missions	2021/2022	Complete 2021/On-going 2022
Continue policy of maximising overburden usage as raw material.	2021/2022	Complete 2021/On-going 2022
Continue policy of maximising filler content of cements in line with quality requirements	2021/2022	Complete 2021/On-going 2022
Minimise Clinker proportion in CEM II bulk & bagged cements in line with quality requirements	2021/2022	Complete 2021/On-going 2022
Continue awareness in energy reduction	2021/2022	Complete 2021/On-going 2022
Increased levels of transparency with local community	2021/2022	Complete 2021/On-going 2022
Continue employee awareness building on waste recycling and waste segregation	2021/2022	Complete 2021/On-going 2022
Continue employee awareness building on environmental responsibility	2021/2022	Complete 2021/On-going 2022
Improve abatement system efficiencies	2021/2022	Complete 2021/On-going 2022
Continued monitoring of the Groundwater wells in accordance with the guidance on the authorisation of discharge to Groundwater's as required per IE licence	2021/2022	Complete 2021/On-going 2022
Monitor emissions to water from site and review water usage levels throughout the year	2021/2022	Complete 2021/On-going 2022

Comment

The site maintains accreditation for Environmental Management System (EMS) ISO14001 (2015).

This EMS references the most significant environmental aspects and associated impacts on-site.

This EMS maintains an Environmental Management Programme (EMP) as required in accordance with the licence requirements

Beyond Compliance

Explanation

We are legally required to comply with our environmental licence. However, the EPA realise that some sites go further than just complying with their environmental licence requirements. Some projects carried out at facilities can have long term positive impacts on the environment and local communities.

The EPA's beyond compliance initiative is encouraging us to identify and report on these environmental and sustainability projects. For example, the project could involve renewable energy, biodiversity, water conservation or exemplar community engagement.

Did any project completed on your site in the reporting year go beyond your licence requirements?

Yes

No

If yes, provide details of one case study in Appendix III that demonstrates how the project went beyond compliance of your licence.

3) Energy & Water

Energy

Explanation

Fossil fuels such as coal, gas and oil are non-renewable resources. As a result, our EPA licence requires that we measure our energy use and set targets to improve the energy efficiency of our activities and reduce our overall use, where possible. Where we have the means and technology on-site to generate energy, this is also captured in this report.

The information below summarises the energy used this year compared to the previous year and includes renewable and non-renewable energy types.

Table 3 Energy Used

Energy Used	Quantity (GJ)	% Increase/ decrease on previous year
Electricity	Commercially Sensitive Information	
Heavy Fuel Oil		
Light Fuel Oil		
Natural Gas		
Coal / Solid Fuel		
Peat		
Renewable Biomass		
Renewable Energy Generated On-site		
Total Energy Used		

Comment

Commercially Sensitive Information

The information below summarises the energy we generated on our site this year with specific focus on renewable energy generation.

Table 4 Energy Generated

Energy Generated	Quantity (GJ)	% Increase/ decrease on previous year
Renewable Energy	Not Applicable	
Total Energy Generated		

Comment

Not Applicable

Water

Explanation

Water is a natural resource and we are required by our EPA licence to identify ways to reduce our use where possible. Water used in industry can be extracted from groundwater, rivers and lakes (surface water), taken from public water supplies (Irish Water), recycled from the facility's processes or harvested from rainwater.

The information below summarises and compares the quantity of water used this year compared to the previous year.

Table 5 Water Used

Source of Water Used	Quantity (m³/year)	% Increase/ decrease on previous year
Groundwater	2,051,161	-12.97%
Surface Water		
Public Supply		
Recycled Water		
Rainwater		
Total Water Used	2,051,161	-12.97%

Comment

Of the quarry water used 1,905,584 m³ was discharged back to the environment and 145,576 m³ was cooling water used in the process which evaporated.

Water is taken from the quarry sump area which is a catchment of all water in the quarry area.

4) Environmental Complaints

Explanation

Our EPA licence requires that activities do not cause environmental nuisance such as odour, dust or noise. Our licence also requires that we have procedures in place to record, investigate and respond to environmental complaints if or when they arise.

We have an environmental complaints procedure in place where you can contact us⁴ directly. You can also contact the EPA⁵ if you wish to make an environmental complaint, confidentially or not.

See the information below for a summary of **all** the environmental complaints relating to our activities made directly to us and to the EPA this year.

Table 6 Summary of All Environmental Complaints Received in

Type of Complaint	Number of Complaints	Number Closed
Odour / Smells	2	2
Noise	3	3
Dust	11	11
Water Quality		
Air Quality	1	1
Waste		
Litter		
Vermin/Flies/Birds		
Soil Contamination		
Vibration	4	4
Other		

⁴ See Section 1, Introduction – Contact Us

⁵ If you wish to contact the EPA to make an environmental complaint about an EPA licenced facility, please go to <https://lema.epa.ie/complaints>

Comment

After investigations were carried out, Irish Cement was not found to be the source of dust observed by all 11 dust complainants.

After investigations were carried out, Irish Cement was not found to be the source of noise reported by the 3 noise complainants.

After investigations were carried out, Irish Cement was not found to be the source of the odour reported by 2 complainants.

All blasts monitored were compliant with licence limits.

All complaints were closed out to the satisfaction of the Agency.

5) Environmental Incidents

Explanation

It is our responsibility as an EPA licensed facility to ensure we have systems in place to prevent incidents that have the potential to cause environmental pollution. If an incident occurs, we are required to report it to the EPA, investigate the cause and fix the problem.

The EPA classify environmental incidents into 5 categories based on the potential impact on the environment:

- Minor
- Limited
- Serious
- Very Serious
- Catastrophic

See Table 6 for the number of the environmental incidents we reported to the EPA this year.

Table 7 Number of Environmental Incidents

Incident Category	Minor	Limited	Serious	Very Serious	Catastrophic
Abatement Equipment Offline					
Breach of Ambient ELV					
Breach of Emission Limit					
Explosion					
Fire					
Monitoring Equipment Failure					
Odour					
Spillage					
Breach of trigger Level					
Uncontrolled Release					

Incident Category	Minor	Limited	Serious	Very Serious	Catastrophic
Other					

Comment

6) Our Environmental Emissions

Explanation

We are required to ensure the emissions from our activities do not cause environmental pollution.

We are required to monitor any of the following emissions that we make:

- Storm water
- Waste water
- Air
- Groundwater
- Noise

We regularly test any such emissions for specific pollutants and materials to ensure they do not contain levels of pollution that exceed emission limit values (ELVs) or cause environmental pollution. If monitoring of an emission indicates an ELV is exceeded, we are required to report this to the EPA⁶.

The next sub-sections of this report summarise our compliance with any ELVs set in our EPA licence. Some emissions monitored do not have specific ELVs, but we still carry out monitoring and report all incidents that may give rise to environmental pollution.

⁶ See section 5, Incidents

Storm Water

Explanation

Storm water is rain water run-off from roof and non-process areas of a facility, e.g. car parks, and generally shall not contain any pollution. Storm water is usually released into a local water body after a basic form of treatment. Our EPA licence requires that we manage storm water to ensure no polluting substances or materials are released into the environment.

The information below summarises how the storm water from our facility is treated, where it is released and the results of monitoring this year.

1. Storm water from our facility is managed prior to release by;

Surface water from the facility is collected through various drains onsite before passing through a settlement tank and oil interceptor at emission point reference number SW1.

Excess quarry water is pumped from the quarry sump and passes through a settlement tank and oil interceptor to emission point reference number SW2.

Outflow from Bunlicky Pond to Limerick Dock waterbody - River Shannon takes place at emission point reference number SW3.

2. Storm water from our facility is released into the following water bodies:

Bunlicky Pond

Table 8 Summary of Storm Water Monitoring

Parameter measured	No. of Samples	% Compliant⁷	Comment
SW1 – Temperature	12	100%	
SW1 – pH	12	100%	
SW1 – BOD	12	100%	
SW1 – Mineral oil	12	100%	
SW1 – Suspended solids	12	100%	
SW1 – Toxicity	1	100%	
SW2 – Conductivity	4	100%	
SW2 – pH	4	100%	
SW2 – BOD	4	100%	
SW2 – Mineral oil	4	100%	
SW2 – Suspended solids	4	100%	
SW3 – pH	2	100%	
SW3 – Conductivity	2	100%	
SW3 – BOD	2	100%	
SW3 – Mineral oil	2	100%	
SW3 – Suspended solids	2	100%	
SW3 – Total ammonia	2	100%	
SW3 - Chloride	2	100%	
SW3 – Individual heavy metals	2	100%	

Add rows as necessary

⁷ % compliant = [(number of samples compliant) / (number of samples taken)] x 100. Compliance could refer to emission limit values or trigger levels. The EPA commonly use trigger levels on stormwater discharges.

Comment

There was no evidence of contamination of water bodies observed in 2021.

Weekly visual inspections of surface water discharges to SW1 and SW2 took place with no evidence of contamination observed.

All results comply with the ELV's of the licence.

Waste Water

Explanation

There are two types of waste water that can be produced:

- Process waste water produced from the activities and;
- Sanitary waste water from toilets, washrooms and canteens.

Our EPA licence requires us to manage our waste water on or off-site and ensure that it does not cause environmental pollution when discharged into the environment.

The information below summarises how we treat the waste water produced from our activities, where it is released and the results of monitoring this year.

1. Waste water produced by our activities is treated as follows before discharge to a receiving waterbody;

Sanitary waste water is discharged directly to the nearby Limerick Co Council municipal waste water treatment plant.

There is no process waste water produced from the activities.

Cooling water is used for the cooling of bearings and compressors onsite. This ends up in the surface water drains before passing through a settlement tank and interceptor at emission point reference number SW1.

2. Treated waste water from our facility is released into the following water bodies:

N/A

Table 9 Summary of Waste Water Monitoring

Parameter measured	No. of Samples	% Compliant	Comment
Not Applicable			

Add rows as necessary

Comment

N/A

Air

Explanation

Generally, three types of air emissions are monitored from industry in Ireland: gases, dust (particulates) and odour. Our EPA licence requires us to ensure that any air emissions from our activities do not cause air pollution or create an odour nuisance.

The information below details the number of air emission points we monitor, the results from testing the air emissions and any odour assessments carried out by us and the EPA this year.

1. We monitor air emissions from the following number of emission points at our facility.

Major emission points - A2-01, A2-02, A2-03, A2-04, A2-05, A2-06 and A2-07.

Table 10 Summary of Air Emissions Monitoring

Parameter measured	No. of Samples	% Compliant	Comment
A2-01 Particulates	Continuous monitoring	100%	
A2-01 NOx	Continuous monitoring	100%	
A2-01 SOx	Continuous monitoring	100%	
A2-01 NH3	Continuous monitoring	100%	
A2-01 CO	Continuous monitoring	100%	

A2-01 HCl	Continuous monitoring	100%	
A2-01 HF	Continuous monitoring	100%	
A2-02 Particulates	Continuous monitoring	100%	
A2-01 Particulates	4 (Quarterly)	100%	
A2-01 NOx	4 (Quarterly)	100%	
A2-01 SOx	4 (Quarterly)	100%	
A2-01 NH3	4 (Quarterly)	100%	
A2-01 CO	4 (Quarterly)	100%	
A2-01 Hg	4 (Quarterly)	100%	
A2-01 Dioxins and furans	4 (Quarterly)	100%	
A2-01 HCl	4 (Quarterly)	100%	
A2-01 HF	4 (Quarterly)	100%	
A2-01 Cd & Tl	4 (Quarterly)	100%	
A2-01 TOC	2 (Quarterly)	100%	
A2-01 Remaining Metals	4 (Quarterly)	100%	
A2-02 Particulates	4 (Quarterly)	100%	
A2-02 NOx	4 (Quarterly)	100%	
A2-02 SOx	4 (Quarterly)	100%	
A2-02 NH3	4 (Quarterly)	100%	
A2-02 CO	4 (Quarterly)	100%	
A2-02 Hg	4 (Quarterly)	100%	
A2-02 Dioxins and furans	4 (Quarterly)	100%	
A2-02 HCl	4 (Quarterly)	100%	
A2-02 HF	4 (Quarterly)	100%	
A2-02 Cd & Tl	4 (Quarterly)	100%	
A2-02 TOC	4 (Quarterly)		No ELV
A2-02 Remaining Metals	4 (Quarterly)	100%	

A2-03 Particulates	4 (Quarterly)	100%	
A2-04 Particulates	4 (Quarterly)	100%	
A2-05 Particulates	4 (Quarterly)	100%	
A2-06 Particulates	4 (Quarterly)	100%	
A2-07 Particulates	4 (Quarterly)	100%	

Add rows as necessary

Comment

P0029-06 licence granted in May 2021 which required the removal of A2-02 emission point and an update to the ELV's at A2-01.

Table 11 Summary of Odour Assessments Carried Out

Assessment Conducted By	No. of Odour Assessments	% Compliant⁸	Comment
Licence Holder	Not Applicable		
EPA			

Add rows where necessary

Comment

N/A

⁸ A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at [Air Enforcement | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/enforcement/)

Fugitive Solvent Emissions

Are you required to monitor fugitive solvent air emissions from your facility?

Yes

No

Explanation

The use of solvents is regulated under Irish and European Union (EU) Regulations⁹. Solvents are chemicals that, by their nature, are volatile (evaporate readily under ambient conditions). Solvents can be found in many inks, glues and cleaning agents. Due to the volatility of solvents some emissions may be released into the atmosphere during our activities before being captured in our air treatment system. This type of emission is called a **fugitive solvent emission**.

The information below summarises the quantity of solvents used this year, the percentage of fugitive solvent emissions (% of total quantity used) and whether the percentage complied with the targets set in the EU Regulations.

Table 12 Summary of Fugitive Solvent Emissions

Quantity of Solvents Used (Kg)	% Fugitive Solvent Emissions	Compliant

Comment

N/A

⁹ See Annex VII of the Industrial Emissions Directive

<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

Groundwater

Explanation

Groundwater is an important and sensitive resource in Ireland. Our EPA licence requires that we monitor groundwater to ensure our activities do not cause groundwater pollution.

Understanding how groundwater flows through soil and rock layers and eventually into surface and coastal waters is a complex science. Sometimes groundwater pollution that occurred in the past can take years and even decades to disappear. Therefore, it is important that experts help us monitor and interpret results from groundwater monitoring and testing.

The information below is a basic summary of the condition of the groundwater this year.

1. Do you have a groundwater monitoring programme in place?

Yes

No

2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?

Yes

No

Table 13 List of Groundwater Pollutants Identified

Pollutants

Add rows as necessary

3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.

--

Comment

Irish Cement carries out groundwater monitoring in line with condition C.7.1 of the licence.
--

Groundwater monitoring results indicate that Irish Cement facility is having no effect on the groundwater regime under the site.
--

Noise

Explanation

Our EPA licence requires that we monitor noise emissions from our facility. Noise monitoring can be conducted at the boundary of our facility and/or at locations beyond the boundary referred to as “noise sensitive locations”. Noise monitoring requires the use of special noise monitoring equipment. Our EPA licence requires that noise produced by our facility shall not exceed the noise limit values and/or give rise to nuisance.

The information below gives a summary of when and where we conducted noise monitoring this year and if results complied with our EPA licence limits.

1. We conducted noise monitoring on the following dates this year:

22nd January, 5th February, 29th March, 10th April, 9th June, 27th July, 4th August, 7th September, 5th October, 1st November, 8th December.

2. Where was the noise monitoring carried out?

- i. the boundary of our facility;
- ii. noise sensitive locations off-site; or
- iii. both.

iii Both

3. Were measured noise levels compliant with your EPA licence limits?

Yes

No

If No, we took the following actions to address the noise level exceedances?

Comment

Noise is managed onsite in accordance with Irish Cements noise mitigation and control program.

All noise survey results were compliant with licence limits.

7) Waste

Waste Generated

Explanation

Our EPA licence requires us to manage the waste we generate in a manner that does not cause environmental pollution.

We manage, store and record hazardous, non-hazardous and inert waste we generate in accordance with our licence. We ensure that this waste is subsequently treated or disposed of in accordance with the relevant waste Regulations.

The information in Table 14 is a summary of waste we generated this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste generated that was reused, recycled or recovered.

Table 14 Waste Generated

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	45.7	-61%	58%
Non-Hazardous	360.46	-6%	100%
Inert	0		
Total Tonnes	406.16	-19%	95%

Comment

Of the hazardous waste removed from site 58% was recycled or reused and 42% was disposed.

Decrease in hazardous waste was primarily due to the removal of construction materials containing asbestos in 2020 from site that came from old buildings that was not removed in 2021.

Of the non-hazardous waste removed from site 100% was recycled or reused.

Waste Accepted

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Yes

No

Explanation

Our EPA licence requires us to manage the waste we accept in a manner that does not cause environmental pollution.

We manage, store and record all incoming and outgoing hazardous, non-hazardous and inert waste. The waste we accept may be treated, recovered, disposed or stored at our facility depending on our licence requirements.

The information in Table 15 provides a summary of waste we accepted this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

Table 15 Waste Accepted

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	Not Applicable		
Non-Hazardous			
Inert			
Total Tonnes			

Comment

Not Applicable

8) Financial Provision

Explanation

Our EPA licence requires us to assess the risk our activities pose to the environment if we cease our activities or if an incident occurred. If we are identified as a high risk facility¹⁰ by the EPA, we are required to put provision in place such as a financial bond or insurance to cover the cost of restoring our site to a satisfactory condition. This financial provision can then be used to cover the cost of managing the restoration or clean up should such an event occur.

1. Are you required to have an agreed financial provision in place?

Yes

No

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the Agency?

2018

3. What year was your Environmental Liability Assessment Report (ELRA) agreed by the Agency?

2018

4. Has there been any significant changes on your site since the last agreements?

Yes

No

If yes, have you submitted details to the EPA?

Yes

No

N/A

¹⁰ See Appendix II

Appendix I

Class of Activity

Industrial and waste facilities are classed into different sectors depending on the nature of their activity and its potential impact on the environment. The EPA Act 1992 as amended, outlines these as follows:

Class 1	Minerals and other materials
Class 2	Energy
Class 3	Metals
Class 4	Mineral fibres and glass
Class 5	Chemicals
Class 6	Intensive Agriculture ¹¹
Class 7	Food and drink
Class 8	Wood, paper, textiles and leather
Class 9	Fossil fuels
Class 10	Cement, lime and magnesium oxide
Class 11	Waste
Class 12	Surface Coatings
Class 13	Other Activities

¹¹ This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at [Compliance & Enforcement: Licensees: Reporting Publications | Environmental Protection Agency \(epa.ie\)](#)

Appendix II

High Environmental Risk Categories

If an industrial or waste licence falls into one of these categories it is deemed, by the EPA, as a high environmental risk. As a result, the licence holder is required to have financial provision in place. See section 8, Financial Provision.

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

NOTE:

This list is subject to change.

See the link below for further information.

[Compliance & Enforcement: Financial Provisions Publications | Environmental Protection Agency \(epa.ie\)](#)

Appendix III

Beyond Compliance

The case study below shows how we went beyond the requirements of our licence in the reporting year.

