



### Objection

Objector:	Mr. Mark Heffernan
Organisation Name:	Dublin Waste to Energy Limited
Objector Address:	Pigeon House Road, Ringsend, Poolbeg, Co. Dublin.
Objection Title:	see attached
Objection Reference No.:	OS011091
Objection Received:	18 April 2023
Objector Type:	Applicant
Oral Hearing Requested?	No

### Application

Applicant:	Dublin Waste to Energy Limited
Reg. No.:	W0232-02

See below for Objection details.

Attachments are displayed on the following page(s).

Original




**Objection to Proposed Decision PD W0232-02 on behalf of the applicant Dublin Waste to Energy Limited.**


**Date: 18<sup>th</sup> April 2023**

Name and Address of Objector: Dublin Waste to Energy Limited  
Pigeon House Road,  
Poolbeg,  
Dublin 4.  
D04 N2P2  
Ireland.

**Objection refers to Proposed Decision W0232-02**

Delivered by Hand by  
Mark Heffernan  
Environmental Manager,  
Encyclis Limited  
On behalf of  
Dublin Waste to Energy Limited.

Signed:  
  
Mark Heffernan  
Environmental Manager  
Encyclis Limited

Signed:  
  
Kieran Mullins  
Project Director  
Dublin Waste to Energy Limited.



Environmental Licensing Programme,  
Office of Environmental Sustainability,

**Date: 18<sup>th</sup> April 2023**

To whom it concerns,

In accordance with Section 87(5) of the EPA Act 1992 as amended and in accordance with Section 87(12) of the EPA Act 1992 as amended, Dublin Waste to Energy Limited (the applicant) hereby objects to the proposed decision W0232-02 issued on the 23<sup>rd</sup> March 2023 by the Environmental Protection Agency.

The objection fee of €253.00 Euros has been lodged with the Environmental Protection Agency and the receipt of this payment is attached overleaf.

The grounds for the objection and the reasons, considerations and arguments on which they are based are enclosed overleaf.

This objection is submitted by hand to the offices of the Environmental Protection Agency, Office of Environmental Sustainability, EPA Headquarters, P.O. Box 3000, Johnstown Castle Estate, County Wexford.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Heffernan", with a horizontal line underneath.

Mark Heffernan  
Environmental Manager,  
Encyclis Limited.

Payment Details

Payment Reference No. [REDACTED]

Printed On  
Wednesday, April 12, 2023  
12:30:24 PM

Pay From

CURRENT ACCOUNTS , LOWER BAGGOT ST DUBLIN 2 ,  
[REDACTED]

Pay To

ENVIRONMENTAL PROTECTION AGENCY ,  
[REDACTED]

Payment Details

€253.00 on 12/04/2023, SEPA Payment

Status

Payment Processed



**Condition number – 1.11.2 –**

*Incinerator residues destined for ships within the Dublin port area may be dispatched from the installation at anytime. Otherwise, waste shall be dispatched from the installation only between the hours of 08:00 hours to 18:30 hours Monday to Friday inclusive and 08:00 hours to 14:00 hours on Saturdays.*

**Grounds For Objection:**

This condition was already amended under LR 060066 dated the 7<sup>th</sup> July 2021. The hours stated in the current condition are not workable as the previous condition (1.11.1) states the installation operates on a 24-hour basis seven days a week. All Air Pollution Control Residues (APCr) are transferred currently to Belview Port, Co. Kilkenny and therefore the proposed hours of operation are not workable. Dublin Waste to Energy (DWTE) respectfully request that condition 1.11.2 be amended to facilitate the removal of all residues off-site at anytime, as already accepted by the Agency as the appropriate dispatch hours.

(See previous Agency approval in Appendix 1)

**Condition Number - 3.21.2 –**

*The licensee shall maintain a CCTV monitoring system which records all waste vehicle movements into and out of the installation as well as operations in the waste reception hall bunker and ash storage areas the CCTV system shall be operated at all times with digital date stamping. Copies of recordings shall be kept on site and made available to the agency on request.*

**Grounds for objection:**

DWTE respectfully request the addition of a 30-day timeline for the storage of CCTV footage. This was accepted by the Agency as the appropriate and reasonable storage period under license return LR027220.

(See Appendix 2 for previous submission and Agency's approval.)

**Condition number - 3.23.2 –**

*The licensee shall provide and maintain an impermeable concrete surface in all areas of the installation used for the movement, holding, storage or processing of waste. The concrete surface shall be constructed to standard BS EN1992-1-1; 2004 + A1; 2004 as amended or an alternative as approved by the Agency. The licensee shall remedy any defect in concrete surfaces within five working days.*

**Grounds for objection:**

DWTE respectfully request that the standard for tarmacadam is also added to this condition as the majority (in particular all site roads and access ramp to the tipping hall) of the hard standing areas surrounding the facility are of tarmacadam construction. DWTE also request the timeline be amended from "within five working days" to "as soon as is practicable" as the facility operates 24 hours a day 7 days per week, repairs can only be realistically scheduled during planned maintenance outage events. The suggested wording would typically be used for this type of facility with these operating hours.

**Condition number - 3.26.2 –**

*The quantity of waste to be accepted at the installation on a daily basis should not exceed the duty capacity of the equipment at the installation. Any exceedance of this intake shall be treated as an incident.*

**Grounds for objection:**

The duty capacity referred to is a nominal capacity and not the operational capacity of the facility. If DWTE's interpretation of this condition is correct and if this condition were to be enforced, then the facility would be limited to approximately c.560,000 tonnes of waste per annum, which is significantly short of the revised license limit. It would therefore be an illogical condition with no rational basis. The plant has demonstrated that it can process annually up to 690,000 tonnes per annum. If retained, this condition would also potentially mean that the facility would have to stop processing waste on Sundays and Bank holidays and use diesel oil each time to bring the plant down and then back up. Waste to Energy plants [have to] operate on "an always on" basis except for maintenance, etc. and accept sufficient waste to ensure that there is sufficient volume in the pit to ensure the plant can operate continuously ( e.g. on Sunday's and Bank Holidays) and to ensure proper mixing of waste can happen .The proposed restriction would affect national waste capacity. It is also contradictory to the previous condition 1.11.1, which states that the facility is operational 24 hours a day seven days a week. This condition would seem appropriate for a landfill, not a Waste to Energy facility operating 24 hours a day 7 days a week. Therefore, DWTE request the removal of condition 3.26.2.

**Condition - 3.27.**

*Weighbridge and wheel cleaning*

**Grounds for objection:**

All references to wheel cleaning should be removed as there is no requirement for one at the facility (nor is there a suitable location for one)

All areas of the facility are of hard standing with no stone or soil present for vehicles to drive over, nor waste, and as a result negates the need for a wheel cleaning system.

**Condition - 3.27.1 –**

*The licensee shall maintain a weighbridge and wheel cleaner at the installation.*

**Grounds for objection:**

All references to wheel cleaning should be removed as there is no requirement for one at the facility (nor is there a suitable location for one)

All areas of the facility are of hard standing with no stone or soil present for vehicles to drive over, nor waste, and as a result negates the need for a wheel cleaning system.

Again, this condition would seem to be taken from a license for a landfill facility. There is no basis for its inclusion in this license and should be removed.

**Condition - 3.28.2 –**

*The licensee shall maintain an enclosed conveyor system for the transfer of bottom ash to trucks/containers.*

**Grounds for objection:**

There is no conveyor system for the transfer of bottom ash to trucks/containers. It is not feasible for the installation of such a conveyor at the facility. There is a conveyor already in place for the transfer of bottom ash to the bottom ash storage bunker from each set of bottom ash dischargers. Furthermore, all ash transfer to trucks occurs in the facility building which is an enclosed structure and under negative pressure thus preventing dust leaving the building during the ash transfer process. Dublin Waste to Energy respectfully requests the deletion of this condition.

**Condition - 6.2.1**

*The licensee shall prepare a test program for the incineration of each individual or combination of additional wastes proposed for introduction to the incinerator. This program shall be submitted to the agency at least three months prior to implementation.*

**Grounds for objection:**

DWTE respectfully request that the timeline in this condition be reduced to one month as the three-month timeline would not be commercially feasible.

**Condition - 6.26.2 –**

*Soil monitoring shall be carried out at the site of the installation at least once every 10 years. Monitoring shall be carried out in accordance with Schedule C.7.3 soil monitoring of this license.*

**Grounds for objection:**

The site on which the facility sits is made-up of reclaimed land. All operations are on hard standing areas and no discharges are emitted to ground. DWTE would respectfully request the removal of this condition as soil monitoring would serve no purpose on made-up ground or reclaimed land in the Dublin Port area.

**Condition - 7.4**

*The licensee shall identify opportunities for*

- (a) the reduction in quantity of water used on site including recycling and reuse initiatives wherever possible*
- (b) the recovery/recycling of residues*



*(c) optimization of fuel and raw material usage on site*

*these should be incorporated into the schedule of objectives and targets under condition two above.*

and

**Condition - 7.10**

*The licensee shall identify opportunities for reduction in the quantity of water used on site including recycling and reuse initiatives wherever possible. Reductions in water usage shall be incorporated into the schedule of objectives and targets under condition 2 above.*

**Grounds for objection:**

Condition 7.4 and condition 7.10 are duplicates. DWTE requests the deletion of condition of 7.4.

**Condition - 8.6**

*All incinerator residues ashes and abatement system derived material shall be stored within the installation building pending off-site disposal or recovery.*

**Grounds for objection:**

DWTE respectfully seek clarification if the incinerator residues referred to are bottom ash, as the condition number 8.7 below appears to cover the flus gas cleaning residues, etc.

**Condition - 8.7**

*Hazardous boiler ash and flue gas cleaning residues shall be stored at dedicated areas within enclosed structures incorporating dust curtains or equivalent approved and vented through self-cleaning filters or sealed bins on concrete hard standing with contained drainage*

**Grounds for objection:**

DWTE respectfully request the replacement of the word "bins" with "containers" and the removal of the word "concrete" (as per condition 3.23.2)

**Condition -8.11.5**

*Waste arriving at the installation shall be inspected and have its documentation checked at the point of entry to the installation and subject to this verification weighed documented and directed to an appropriate area within the installation. Each load of waste arriving at the installation shall be inspected prior to and during unloading only after such inspections shall the waste be processed for disposal or recovery.*

**Grounds for objection:**

It is not operationally feasible to inspect every load arriving at the facility. Previous approval was granted by the Agency for the current inspection rates under license return LR055547[ in light of how the facility operates and manages its waste loads]. Appendix 3 refers to the previous approved procedure for waste inspections and the Agency’s approval notification. DWTE respectfully requests that the second sentence of condition 8.11.5 is deleted.

**Glossary**

**Definition of Incident:**

(iv) Any exceedance of the daily duty capacity of the waste handling equipment.

**Grounds for objection:**

DWTE respectfully request the removal of item (iv) in the definition of Incident in the glossary. This again limits the operational capacity of the facility for which there is no logical basis as set out above in response to condition 3.26.2.

**Schedule A –**

**Grounds for objection:**

DWTE respectfully request the reinstatement of previously approved EWC codes which appeared in the previous IE license W0232-01. 07 02 12 and 07 05 12 EWC codes were also approved by the Agency under Technical Amendment C previously. These two codes are critical to the pharmaceutical sector due to the lack of suitable outlets for the pharmaceutical sludges in Ireland. Other codes requested are non-hazardous residual wastes and should be included. The Technical Amendment C and previously submitted schedule A is again attached for consideration in Appendix 4. It is also noted that the only other Waste to Energy plant operating in Ireland has over 200 EWC codes approved.

**Schedule C.4**

**Monitoring of incinerator residues.**

Waste Class	Frequency		
Bottom ash, fly ash, boiler ash and flue gas treatment residues.	Monthly <sup>Note 3</sup>		

*Note 3: The TOC of the bottom ash and slag shall be determined on a weekly basis.*

**DWTE agrees to the monthly sampling of bottom ash.**

**Grounds for objection:**

The Agency previously agreed that fly ash and boiler ash be sampled on a quarterly basis. This was previously agreed under license return LR043423. (Appendix 5)

The Total Organic Carbon (TOC)/ Loss of Ignition (LOI) requirement for bottom ash can also be reduced to monthly in line with the IBA sampling as BAT 7 refers to a minimum sampling frequency of 3 months for TOC and LOI. BAT 7 is outlined below.

BAT 7. BAT is to monitor the content of organic substances in slags and bottom ashes at the incineration plant with at least the frequency given below and in accordance with EN standards.

3.12.2019 EN Official Journal of the European Union L 312/67

Parameter	Standard(s)	Minimum monitoring frequency	Monitoring associated with
Loss on ignition (*)	EN 14899 and either EN 15169 or EN 15935	Once every three months	BAT 14
Total organic carbon (*) (*)	EN 14899 and either EN 13137 or EN 15936		

(\*) Either the loss on ignition or the total organic carbon is monitored.  
 (\*\*) Elemental carbon (e.g. determined according to DIN 19539) may be subtracted from the measurement result.

DWTE respectfully requests that the fly ash and boiler ash sampling be reduced to quarterly as previously agreed and the TOC/LOI sampling requirement for bottom ash also be monitored on a monthly basis which is well within the frequency outlined in BAT 7.

**Schedule C.7.3.**

**Soil Monitoring**

**Grounds for objection:**

As requested previously in relation to condition 6.26.2, DWTE does not see the requirement for the soil monitoring requirement as the facility is sited on made-up ground/ reclaimed land. DWTE respectfully request the removal of the requirement for soil monitoring.

**Appendix 1**

Mr. Oliver Gray,  
Office of Environmental Enforcement,  
Environment Protection Agency,  
Richview,  
McCumisky House,  
Clonskeagh  
Dublin 14.

7<sup>th</sup> July 2021.

**Ref: W0232-01: Condition 3.15.3 Waste Acceptance/Removal Hours**

Dear Mr. Gray,

Dublin Waste to Energy Limited request permission for the following as allowed for in condition 3.15.3:

The removal from site of residues at any time.

FGTR removal from the facility is carried out under contract by our third-party contractor (PANDA) on behalf of Dublin Waste to Energy (DWTE). This currently takes place at any time through Dublin Port as outlined in condition 3.15.2.

From mid-July 2021, it is proposed to arrange the shipment of the FGTR material through another licensed facility i.e. Units 4 to 7, Belview Port, Gorteens, Slieverue, County Kilkenny (P1015-02). Trial loads are currently ongoing to commission the Belview facility.

As per condition 3.15.3, DWTE request the same hours of movement of the material from the DWTE facility to the new licensed facility (Belview) as when the material is moving through Dublin Port.

In response to the Agency's request for further information see response below to each item:

1. *"a more comprehensive reasoning as to why the proposed movements of FGTR to Belview Port cannot be removed from the DWTE facility only between the hours of 08.00 hrs to 18.30 hrs Monday to Friday inclusive and 08.00 hrs to 14.00 hrs on Saturdays, as per Condition 3.15.2"*

The DWTE facility is operating on a 24 hour-7 days per week basis and FGTR is always produced during operations. Currently the FGTR is moving off site at any anytime (including night-time, Sundays, and Bank Holidays). Restricting the hours of transfer of this material effectively means that FGTR material could build up on-site and impact on the operation of the facility. The licensed facility (P1015-02) in Belview is also licensed to operate on a 24-hour basis.

The FGTR material will be transported by tanker or sealed box containers on National Primary Routes only and is non-regulated for transport under ADR Regulations (Transport of Dangerous Goods by Road).

Movement of FGTR from the DWTE is under a contract with a third-party contractor. The third party contractor requires the full flexibility to meet its contractual obligations and also the full flexibility to

Dublin Waste to Energy Ltd., Pigeon House Road, Poolbeg, Dublin 4. Tel: +353 (0)1 603 2100

ensure under the Health and Welfare working time Act that staff have the appropriate time off – and may require days where operating will not take place. This will require further loads on the following day and therefore longer hours of operation to make up the time (e.g. currently i.e. Friday and Weekends after not operating on Thursday).

### **Logistical analysis**

Journey time from DWTE to Belview Port in the current Level 5 COVID19 restrictions is 2 hours. The return journey is 4 hours. Adding 60 mins at each location to fill/empty is an additional 2 hours. Therefore, one load per tanker will take 6 hours in total. This journey time will no doubt increase post COVID-19 travel restrictions during normal daytimes. The additional flexibility of off-peak traffic journeys would also reduce journey times. One tanker may only manage 1 load per day if restricted by the Agency's suggested hours of operation which is not sufficient. Even with two tankers full time – only 2 loads per day may be achieved. It is planned not to work one day per week so therefore more than 6 loads will be required the next day to catch up from not loading on one day. The on-site FGTR storage silos would then be full within the first week of the proposed hours of operation suggested by the Agency.

### **Drivers Hours Regulations -**

Guide to EU Rules on Drivers' Hours Regulation (EC) NO. 561/2006 provided by the Road Safety Authority of Ireland state that drivers of vehicles carrying a load of greater than 3.5 tonne must comply with Drivers hours Regulations. These regulations state that drivers must take a 45-minute break after driving for 4.5 hours and are restricted to daily driving of only 9 hours.

The required number of loads (can range from 4 to 6 loads per day) to maintain operations at the DWTE facility cannot be met during the Agency's suggested timeframe of 08:00hrs to 18:30hrs (10.5 hours) Mon to Friday and 08:00hrs to 14:00hrs (6 hours) on Saturday. If the capacity of on-site storage became an issue on a Sunday due to maintenance /malfunction, then the facility would have to reduce load or even potentially shut down until Monday 08:00hrs. This is not workable for a facility that operates 24 hours a day, 7 days per week.

- 2. "demonstrate that these movements will not contravene any conditions of the planning approval granted by An Bord Pleanála in relation to the DWTE installation (any information provided in relation to the movement of the FGTR from the installation in the process of obtaining the planning approval shall also be considered)."*

DWTE has sent correspondence to Dublin City Council (DCC) planning department. DCC has responded, acknowledging the letter from DWTE. In addition, they have noted contents and have not objected to the proposed plan. (See attached letter of request and response from Dublin City Council planning Department).

At no stage is there any contravention or breach of the current planning consent for the movement of residues from the DWTE facility to any other port for the purposes of recovery abroad. It would be prudent to ensure all export avenues are available for the FGTR material given recent disruptions to all supply chains during 2020 and 2021 as a result of both Brexit and COVID-19.

DWTE can confirm that the licensed facility at Belview Port does not fall under the category of “an Establishment for the purposes of the European Union Major Accidents Directive” due to the quantities of FGTR under consideration. This was confirmed by the EPA inspectors report dated 24<sup>th</sup> July 2018 for the awarding of the license for Belview Port facility, (P1015-02) under section 16.4 titled Vulnerability of the Project which stated the following:

*“The SEVESO Directive and Regulations are not applicable at the installation.”*

The Belview Port facility License P1015-02 also contains condition 1.8.1, which states the following:

*“The installation may accept waste and operate on a twenty-four-hour basis, seven days per week.”*

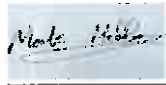
This request for approval would allow the required flexibility for the export for recovery of the FGTR being generated and ensure continuation of critical operations for the DWTE facility. A facility, which is performing critical operations currently for all health care facilities in the State and during COVID-19 restrictions. The movement of this material will take place in fully sealed tankers and will follow National Primary Routes and National and International Regulations for the transport of Hazardous Waste (W.T.F. and T.F.S.) as per condition 8.10 of W0232-01.

This only applies to the removal of all FGTR/APCr material from the DWTE facility to Belview Port.

Finally, the implementation of this proposal will help to reduce Greenhouse gases associated with transport as currently the FGTR is moved on ships in individual 25tonne loads whereas with this solution the FGTR will be moved in several thousand tonne shipments.

We look forward to the Agency’s approval for the above request.

Yours Sincerely,



Mark Heffernan,  
Environmental Manager.  
Covanta Europe Operations Limited.  
On behalf of DWTE.



Dublin Waste to Energy Limited  
Pigeon House Road  
Poolbeg  
Dublin 4  
D04 N2P2  
Ireland

FAO: Mr Richard Shakespeare,  
Floor 3. Block 4,  
Civic Offices,  
Wood quay,  
Dublin 8.

08 June 2021

**REF: Dublin Waste to Energy Facility (the 'Facility') – Planning Reference 29S.EF2022**

Dear Mr. Shakespeare,

I'm writing to inform you that Dublin Waste to Energy Limited as the operator of the Facility, has revised our operational procedures in relation to the management of our Flue Gas Treatment (FGT) residues as we have identified a suitable alternative port for the export of the material for recovery in main land Europe.

In accordance with our revised operational procedures, we now move all FGT residues at suitable times, so as to avoid peak traffic movement within the area adjacent to the Facility, to the Environmental Protection Agency (EPA) licensed facility at the Port of Belview in County Kilkenny. The FGT residues are moved utilising the Strategic Road Network in sealed tanktainers in accordance with supporting EIS, which accompanied the planning application, to enable bulk shipments of the loads for recovery in Europe. The FGT residues were previously exported via a terminal located at the north port in Dublin's Docklands.

I can confirm that the EPA has determined that the Port of Belview site is not a SEVESO site and thus, in accordance with condition 12 of the grant of permission that the associated storage area will not become an Establishment for the purpose of the European Union Major Accidents Directive.

In addition, I can confirm that there is no change to the waste delivery strategy as proposed and outlined in condition 4 of the grant of permission and that the revised operational practise will not increase traffic movements, transporting FGT residues from the Facility over the Thomas Clark Bridge beyond the previous operational procedures.

Please do not hesitate to contact the undersigned for any further information you may require.

Yours Sincerely,

Kieran Mullins  
Project Director

Private Limited Company Registered in Ireland Company Number: 549319. VAT number IE 6419060G  
Registered office: 10 Earlsfort Terrace, Dublin 2, D02 T3B0, Ireland.  
Directors: Vincent Bolognini (American), Helen Murphy, Thomas Koltis (American), Owen Michaelson (UK), Andrew Hartley (UK), Matt Edgar (UK)







Comhairle Cathrach  
Bhaile Átha Cliath  
Dublin City Council

Feidhmiú Pleanála  
An Roinn Pleanála & Forbairt Maoine  
Bloc 4, Urlár 2, Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8

Planning Enforcement,  
Planning & Property Development Department,  
Block 4, Floor 2, Civic Offices  
Wood Quay, Dublin 8  
T. 01 222 2147 E. [planningenforcement@dublincity.ie](mailto:planningenforcement@dublincity.ie)

Mr Kieran Mullins  
Project Director  
Dublin Waste to Energy Limited  
Pigeon House Road  
Poolbeg  
Dublin 4  
D04 N2P2

6<sup>th</sup> July 2021

**Ref: Dublin Waste to Energy Facility (the 'Facility') - Planning Reference  
29S.EF2022**

Dear Mr Mullins,

On behalf of Dublin City Council, I acknowledge receipt of your letter dated 08 June 2021 and note the associated content.

Yours sincerely,

  
Acting Planning Enforcement Manager

Ref: John Downey  
Acting Planning Enforcement Manager/Outdoor Event Licencing Officer

Tel: 01 222 3465  
Email: [john.downey@dublincity.ie](mailto:john.downey@dublincity.ie)

Ceannofig, Oifigí na Cathrach, An Ché Adhmaid, Bhaile Átha Cliath 8, Éire  
Head Office, Civic Offices, Wood Quay, Dublin 8, Ireland

T. 01 222 2222 W. [www.dublincity.ie](http://www.dublincity.ie)



## Licence Return Approval Notice

**Licence:** W0232-01 - Dublin Waste to Energy Limited

**Submitted On:** 14/07/2021

**Licensee Submission** LR060066 **Title** Condition 3.15.3 Waste Acceptance/Removal Hours

### Notification

Dear Mr Heffernan,

The Agency has reviewed your submission (LR060066) in relation to a proposed amendment to the hours of residue removal from the Dublin Waste to Energy Limited (DWtE) installation, Industrial Emissions (IE) Licence Reg. No. W0232-01.

The submission has been considered having regard to Conditions 3.15.1 and 3.15.2 of the IE Licence.

The Agency approves for the flue gas treatment residue/air pollution control residue destined for Belview Port to be removed from the facility at any time.

This approval is for the purpose of the IE Licence under the EPA Act 1992, as amended only and shall not be construed as negating the licensee's statutory obligations or requirements under any other enactments or regulations.

You are reminded of the requirement to comply with the Conditions of IE Licence W0232-01 at all times.

The Agency may at any time, if it considers necessary, revisit and/or revoke this approval.

Yours sincerely,

Ollie Gray

Inspector

Office of Environmental Enforcement, Dublin

Tel: (01) 2680100



## Appendix 2

**FAO: Simon Buckley,  
Office of Environmental Enforcement,  
Environment Protection Agency,  
Richview,  
McCumisky House,  
Clonskeagh  
Dublin14**

**02<sup>nd</sup> February, 2017**

**Ref: W0232-01: Condition 3.4.2 - CCTV Recordings –Duration of Storage for Agreement**

Dear Mr. Buckley,

In compliance with condition number 3.4.2 of license W0232-01, Dublin Waste to Energy will retain all CCTV recordings for a period of 30 days. This is in line with statutory requirements for the storage of security recordings. Please find attached a statement from the CCTV provider WILEC confirming same.

Dublin Waste to Energy await the Agency's agreement on this submission.

If you require further information in relation to attached, please do not hesitate to contact the undersigned.

Yours Sincerely



Mark Hefferian,  
Environmental Manager



Life Safety & Security Systems

**Unit 6 Charvey Business Park  
Rathnew  
Co Wicklow  
tel: 0404 20066  
fax: 0404 20428  
email: [william@wilec.com](mailto:william@wilec.com)**

**Mr Mark Heffernan  
Environmental Manager  
Dublin Waste-to-Energy Facility  
Pigeon House Road, Dublin 4**

Date: 25<sup>th</sup> January 2017  
Ref: L170108WO

Dear Mark,

**Life Safety & Security Systems  
Covanta  
CCTV Recording**

Further to your request I have pleasure to confirm that the CCTV System installed into the Dublin Waste to Energy site, Pigeon House Road, Dublin 4 will be set-up to store previously recorded data for a period of thirty days. Recorded data not removed from the drives will automatically be over written after thirty days.

Mark, I trust that I have interpreted your requirements accurately. However, should you have any queries or if I can be of any further assistance then please do not hesitate to contact me on the above office number.

Yours Sincerely

**William O'Connell – MD.**

*Registered in Dublin no. 357462  
PSA Licence no: 00185  
VAT no: IE6377462W*



## Licence Return Approval Notice

**Licence:** W0232-01 - Dublin Waste to Energy Limited

**Submitted On:** 07/03/2017

**Licensee Submission** LR027220 **Title** Condition 3.4.2- CCTV Duration of Recordings for Agreement

### Notification

Dear Mr Heffernan,

The Agency has reviewed your submission LR027220, regarding the request for approval of a 30 day retention period for closed-circuit television (CCTV) recordings at the Dublin Waste to Energy facility.

The approval is sought under condition 3.4.2 of the industrial emission licence (IEL) Reg. No. W0232-01.

I am to advise you that on the basis of the information provided, the Agency approves your proposal. You are reminded of the requirement to comply with the conditions of IEL Reg. No. W0232-01 at all times.

The Agency may at any time, if it considers necessary, revisit and/or revoke this approval.

If you have any other queries in relation to this matter please contact the undersigned at 01-2680100.

Yours sincerely,

Simon Buckley,

Inspector,

Office of Environmental Enforcement,

Dublin.



### Appendix 3

**Mr. Oliver Gray,  
Office of Environmental Enforcement,  
Environment Protection Agency,  
Richview,  
McCumisky House,  
Clonskeagh  
Dublin 14.**

**18<sup>th</sup> February 2021.**

**Ref: W0232-01: Revised Procedure "Reception and Weighing of Incoming and Outgoing Waste (Ref: COV-DUB-ENV 003).**

Dear Mr. Gray,

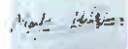
In response to the Agency's correspondence dated 18/12/2020, please see attached revised procedure titled "Reception and Weighing of Incoming and Outgoing Waste (Ref: COV-DUB-ENV 003).

Dublin Waste to Energy would like to add the following in relation to waste inspections at the facility.

- (i) Waste inspections are carried out as previously agreed with the Agency i.e. at least one inspection per operator per day when feasible and safe to do so.
- (ii) As a revision to the procedure, during busy periods on the tipping floor and when safe to do so, Back Door inspections (BD) may be carried out to verify that waste is as per EWC code stated on the weighbridge.
- (iii) During periods when the waste cranes are operated in manual, the waste crane operator has a view of the waste entering the waste bunker to ensure waste conforms to the waste acceptance criteria.
- (iv) Every load of MSW entering the facility is screened for sources of ionising radiation.
- (v) All areas of the waste acceptance cycle are covered by CCTV.

Dublin Waste to Energy are of the view that after 3 full years of operation, the on-site inspections and measures listed above are sufficient to verify that the waste accepted is in accordance with that originally profiled /characterised and that it has been appropriately classified.

Yours Sincerely,



**Mark Heffernan,  
Environmental Manager.  
Covanta Europe Operations Limited.  
On behalf of DWTE.**



<b>Title</b>	<b>Reception and Weighing of Incoming and Outgoing Waste.</b>		
<b>Procedure Ref.</b>	<b>COV-DUB-ENV 002</b>		
<b>Version</b>	004	<b>Pages</b>	9
<b>Issue Date</b>	18/02/2021	<b>Last Modified</b>	14/11/2017
<b>Approved by</b>	D.Fanning/ R.Andrews	<b>Approver Title</b>	Director of Operations/ Operations Manager
<b>Circulation</b>		<b>Classification</b>	
<b>Author Title</b>	M.Heffernan Environmental Manager		
<b>Personnel</b>	Director of Operations, Operations Manager, Environmental Manager, Shift Supervisors, Weigh Bridge Operators.		

## 1. Purpose

The purpose of this procedure is to outline the reception, removal and weighing of waste at the Dublin Waste to Energy facility for waste delivered into the site and waste leaving the site in compliance with condition 8.2.3 (c) and (e) of Industrial Emissions Licence W0232-01.

## 2. Definition

DWTE – Dublin Waste to Energy.  
TFS – Trans frontier shipment form.  
AMCS - Weighbridge Software  
EWC – European Waste Code  
DAT – Driver Assistance Terminal

## 3. Responsibilities.

It is the responsibility of the Director of Operations and the Operations Team to ensure this procedure is adhered to. The Environmental Manager is responsible for the updating of procedures.

## 4. References.

Industrial Emissions Licence W0232-01  
Waste Profiling Procedure  
Radiation Detection Procedure  
Commission Decision 2000/532 of 3<sup>rd</sup> May 2000

## 5. Procedure.

Waste shall be accepted/removed from the facility only by authorized or exempted carriers under national or European legislation.

## Waste Acceptance

### Waste Scheduling

The Director of Operations will consult with the Project Director for the initial scheduling of waste deliveries at the facility. When a waste load needs to be removed from site the Shift Supervisor will contact the Environmental Manager in order to arrange for the removal of the load or part thereof to the appropriate licensed facility for disposal.

### Arrival on Site

The approximate number of daily loads from a customer will be agreed in advance. Many of the reporting requirements as per the licence will have been completed prior to the delivery. Waste profiling as required under condition number 8.2.3. (a) will already have been carried out. Procedure number COV-DUB-ENV WstProf refers. The information that is unique to the load such as the vehicle registration number, producer/collector information, carrier, origin of the waste, and EWC code and all other requirements as per the Industrial Emissions Licence number W0232-01 condition number 11.3.2 are stored on the AMCS weighbridge software system. This information will also be stored on a Radio Frequency Identification (RFID) tag, which will be attached to all regular customer vehicles.

There are 3 weighbridges at the DWTE facility. Two incoming and one outgoing. If required, the middle weighbridge can be used for either incoming or outgoing loads. Both incoming weighbridges at the facility are fitted with radiation detection systems and all incoming loads are scanned for sources of ionising radiation.

The vehicle proceeds onto the weighbridge where the RFID tag will be read automatically by the RFID tag reader. The driver will input only certain information into the Driver Assistance Terminal (DAT). The required information from the driver will be as follows:

1. Driver ID Number (code 0102)
2. Customer Origin Number (Code 12345)
3. EWC Code of Waste (e.g. 20 03 01)

The weighing of the vehicle is initiated once the items 1-3 above are keyed in by the driver onto the DAT. Once the vehicle has been weighed (gross weight) and recorded on the AMCS weighbridge software system, a traffic light at the end of the weighbridge signals green and the barrier will rise, which indicates that the driver can proceed to the top of the ramp to another traffic light signal before being allowed entry to the tipping floor area.

## Unloading of Vehicles

In the tipping hall, the driver follows the instructions of the Tipping Floor operator. The Tipping Floor operator also operates the front-end loader vehicle in the tipping floor area. The Tipping Floor operator will direct the waste vehicle to a designated tipping bay (from the loader vehicle via a tablet device- (part of the traffic management system) where the load will be discharged directly into the waste bunker. All waste vehicle drivers must adhere to the Rules of Entry (attached). After discharging the load to the waste bunker, the driver then returns to the weighbridge and weighs out before exiting facility. All waste vehicle drivers must complete Driver Induction Training provided by the Dublin Waste to Energy facility. If a waste vehicle driver has not completed this training, then entry into the facility will be prohibited.

## Exit - Tare Weighing

The empty vehicle proceeds to the exit weighbridge, where it will be weighed automatically using the RFID tag thus completing the transaction. A weighbridge ticket will be printed for the driver on the weighbridge DAT to retain for the records of the haulier. The vehicle can then exit the facility.

## Waste Inspections

The Tipping Floor operator will randomly select loads for inspection, which will be at a minimum one load daily from each operator where feasible. Once a load is selected, the load will be tipped onto the tipping hall floor for inspection. A Waste Inspection Sheet (Appendix 1) will be completed and kept on file. If the waste load is deemed acceptable (as per EWC codes in IE licence W0232-01) then the Tipping Floor operator uses the front-end loader vehicle to remove the load from the tipping hall floor and place it into the waste bunker. Back door inspections (BD) may also be carried out during busier periods where feasible and noted on the waste inspection sheet. This may only take place if safe to do so. During manual waste crane operations (when an operator is seated the waste crane chair) there is also the opportunity to observe waste tipping into the bunker. Any items observed by the crane operator to be non-conforming can also be flagged with the operations team and the item or items can be removed from the bunker.

CCTV cameras are also in operation in all areas of the waste acceptance cycle. Weighbridge incoming and outgoing, tipping floor access ramp, tipping floor, waste bunker bays 1-12, waste bunker north and south are all equipped with CCTV cameras. Verification of waste types and any non-conforming waste can therefore be detected using a combination of all the above measures or part thereof at the Dublin Waste to Energy facility.

## Quarantine

If the load or part thereof is deemed unacceptable, the tipping hall operator will place the load or part thereof into the quarantine bay area. The load or item will be appropriately stored and clearly labeled. The appropriate contractor will be contacted for the immediate removal of the quarantined load off site for proper disposal at the appropriate authorized facility. The waste inspection sheet (Appendix 1) will also be completed for each rejected load/item. This will be completed by the Tipping Floor operator. All quarantined loads will be weighed on the weighbridge when exiting the facility.

For Refuse Collection Vehicles (RCV's) arriving to the facility directly from their collection routes, the same random inspections will also be carried out.

If a waste type has passed the inspection, has been tipped into the waste bunker, incinerated, and has subsequently found to be unsuitable for incineration, then that waste type will be deemed unacceptable. The waste will be added to the list of unacceptable wastes, the tipping floor operators advised, and an updated waste acceptance criteria form given to all relevant personnel. That waste will no longer be accepted, and the relevant waste contractor advised.

## Unplanned Deliveries.

In the case of unplanned deliveries, the DWTE personnel will confirm that the waste delivery is from an approved contracted customer and the waste type is acceptable for receipt at the facility. The details of the waste vehicle and customer details will be entered manually (if not RFID tagged) on the ACMS weighbridge software system. Once all details are entered and accepted, the load can proceed to the tipping floor.

## Incinerator Bottom Ash (IBA) and Flue Gas Treatment Residue (FGTR) Leaving Site

Waste for removal from site is notified by the Shift Supervisor. The Environmental Manager will be contacted to arrange removal of the waste material from site. The loads will be removed off site by approved contractors only. All waste leaving site will be categorized by EWC code, weighed and recorded on the ACMS weighbridge software system. All IBA will leave the site for export under TFS notifications through Dublin City Council TFS Office. The IBA will be transported to South Wall Quay in Dublin Port (500 m from the facility) by approved permitted contractors and loaded onto ships for export abroad. All FGTR will leave the site under TFS notifications through the Dublin City Council TFS Office. A third-party hazardous waste company will manage the export of this material to hazardous waste facilities abroad.

### FGTR Bagging Station

To enhance the contingency arrangements for the removal of FGTR from the DWTE facility, the plant will also have the capability to fill Flexible Intermediate Bulk Container (FIBC) bags to allow for transport of the FGTR in sealed containers. A mobile FGTR bagging station specifically designed for this purpose is used on site. The bagging station receives the same airtight flexible “elephant’s trunk” fitting and the FGTR can be placed into bags. Once a bag has been filled, it is securely closed and placed into a 40ft sealed container for transport to a hazardous waste facility in Europe.

### Computer System Failure

In the event of computer failure, the weighing process will be executed manually, and all data recorded and entered to a specified file or on paper copies. Once the system is running again this data can then be uploaded to the computer system. All weighbridge data will be backed up on a central server within the IT department.

### Recording Weight of each Category

All loads will be categorised by EWC code. This will apply to all incoming and outgoing loads. Daily, Weekly, Monthly, Quarterly and Annual tonnage reports will be compiled and stored on site. Quarterly and Annual tonnage reports will be submitted to the Agency as required by the licence requirements. In compliance with IE licence condition 8.2.3 (e) and Commission Decision 2000/532 of 3<sup>rd</sup> May 2000 all loads will be weighed and categorised by EWC code. All data will be stored on the AMCS weighbridge software system and data will be backed up by IT department.

## **RULES OF ENTRY REQUIREMENTS**

1. ALL DRIVERS SHALL ATTEND A SAFETY INDUCTION BEFORE ENTERING THE FACILITY
2. ONLY PRE-APPROVED WASTE IS ACCEPTABLE AT THE FACILITY
3. ALL WASTE VEHICLES ENTERING THE FACILITY SHALL BE COVERED
4. NO QUEUEING SHALL TAKE PLACE OUTSIDE THE FACILITY OR AT ANY LOCATION ON THE PUBLIC ROADS BY VEHICLES DESTINED FOR THE DUBLIN WASTE TO ENERGY FACILITY
5. ALL VEHICLES SHALL BE MECHANICALLY SOUND AND ROAD WORTHY
6. ALL NOISE REDUCING SILCENCERS /MUFFLERS SHALL BE FULLY OPERATIONAL
7. ALL REVERSING SIRENS / BEACONS SHALL BE FULLY OPERATIONAL AND BE MAINTAINED
8. ALL DRIVERS SHALL BE APPROPRIATLEY **CPC TRAINED** AND BE MADE AWARE OF THE LICENCE REQUIREMENTS OF THE FACILITY AND EWC CODES OF THE WASTE IN THE VEHICLE
9. NO DRIVER/PERSONS ARE ALLOWED TO ACCESS TOP OF VEHICLE/TRAILER UNIT UNDER ANY CIRCUMSTANCES
10. IN THE EVENT OF A MECHANICAL ISSUE WITH A HAULIERS VEHICLE, METHOD STATEMENTS AND RISK ASSESSMENTS AND ANY OTHER RELEVANT INFORMATION TO BE PREPARED AND APPROVED PRIOR TO ANY WORKS BEING CARRIED OUT, FOR EXAMPLE CHANGE OUT OF HYDRAULIC HOSE, PUNCTURE OR FAILURE OF TRACTOR UNIT OR TRAILER.
11. WATCH FOR TIPPING FLOOR HAZARDS. EXERCISE CAUTION AND GOOD JUDGEMENT.
12. DO NOT POSSESS, CONSUME OR BE UNDER THE INFLUENCE OF DRUGS OR ALCOHOL. DO NOT SMOKE
13. FOLLOW DIRECTIONS GIVEN BY THE FACILITY EMPLOYEES.
14. FOLLOW ALL PROCEDURES REQUIRED BY YOUR EMPLOYER
15. OBSERVE POSTED SPEED LIMITS. STOP AT ALL STOP SIGNS. FOLLOW FLOW OF TRAFFIC SIGNS. WASTE PROVIDERS ARE OBLIGATED TO REMOVE DISABLED TRUCKS FROM THE FACILITY. DWTE RESERVES THE RIGHT TO TOW A DISABLED VEHICLE IF CAUSING AN OBSTRUCTION
16. DO NOT LEAVE YOUR VEHICLE UNATTENDED. DO NOT BUMP VEHICLES OR ROLL INTO OR OVER THE PIT CURBS
17. ENSURE THE CRANE GRAPPLE IS CLEAR OF THE BAY AREA BEFORE BACKING INTO THE BAY TO TIP THE LOAD
18. SECURE WASTE VEHICLES SO LEAKING OR SPILLING WON'T HAPPEN
19. BEFORE TIPPING CAN COMMENCE, VEHICLE DOORS MUST BE OPENED ON THE MAIN TIPPING FLOOR AREA UNDER SUPERVISION OF THE TIPPING FLOOR MANAGER. **UNDER NO CIRCUMSTANCES CAN THIS BE DONE IN THE TIPPING BAY.** ONCE THE DOORS ARE OPEN, REVERSE THE VEHICLE INTO THE TIPPING BAY AND OFFLOAD. AFTER TIPPING, DRIVE FORWARD SO THE BACK OF THE TRUCK IS OUTSIDE OF THE TIPPING BAY AREA, CLOSE AND SECURE REAR DOORS AND PROCEED TO THE EXIT

20. DON'T JOG THE VEHICLE BACK AND FORTH TO JAR THE LOAD LOOSE WHEN THE TRUCK IS PACKED TOO TIGHTLY.
21. DON'T STAND BEHIND THE VEHICLE TO ATTEMPT TO LOOSEN THE LOAD.
22. FACILITY EMPLOYEES ARE NOT PERMITTED TO HELP YOU RELEASE OR FREE-UP YOUR LOAD.
23. IF SELECTED FOR INSPECTION YOU MAY BE ASKED TO TIP DIRECTLY ONTO THE TIPPING FLOOR AREA. FOLLOW THE TIPPING FLOOR MANAGER'S INSTRUCTIONS.
24. FACILITY MANAGEMENT WILL NOTIFY YOUR EMPLOYER IF YOU DO NOT FOLLOW THESE PROCEDURES. A BREACH IN OPERATING PROCEDURES MAY RESULT IN THE DRIVER FROM THE FACILITY BEING DISMISSED.
25. NO ONE SHALL CRAWL UNDERNEATH A TRUCK AND/OR TRAILER OR INSIDE THE HYDRAULIC RAM COMPARTMENT ON PACKER TRUCKS, WHILE ON THE TIPPING FLOOR.
26. ALL DRIVERS MUST HAVE FULL SPECIFIED PPE WITH THEM IN THEIR CAB PRIOR TO ARRIVING ON SITE I.E. HARD HATS, SAFETY GLASSES, HIGH VISIBILITY VESTS, SAFETY BOOTS AND GLOVES
27. ANY RESIDUAL WASTE REMAINING ON THE BACK OF THE TRAILER AFTER TIPPING IS TO BE REMOVED BY THE DRIVER PRIOR TO LEAVING THE TIPPING HALL.
28. IN THE EVENT OF WASTE JAMMING IN THE TRAILER, THE DRIVER IS NOT ALLOWED TO BUMP THE TRAILER OFF THE PLINTH BLOCK OF THE TIPPING GATE OR JOLT THE TRUCK TO FREE UP WASTE
29. NO SCAVENGING ON THE TIPPING FLOOR OR IN ANY AREA OF THE FACILITY
30. DRIVERS /ATTENDANTS ARE TO STAY WITHIN 1 METRE OF THEIR VEHICLE AT ALL TIMES
31. TOILET FACILITIES ARE PROVIDED FOR DRIVERS AT THE WEIGHBRIDGE



APPENDIX 1 – Waste Inspection Sheet



**Waste Inspection Sheet / Profiling / Rejected Load Record**

Date:

Waste Inspection by:		Track/Bag No	Origin/Size	EWC Code	Is waste to EWC code?	Lead Requested
1	Date					
	Time					
	Load Returned to Origin					
	YES				YES	YES
	NO				NO	NO
					Waste operator contacted	NO
					Images available of waste type	NO
					Copy of email sent to waste operator	NO
						Attach if required
2	Date					
	Time					
	Load Returned to Origin					
	YES				YES	YES
	NO				NO	NO
					Waste operator contacted	NO
					Images available of waste type	NO
					Copy of email sent to waste operator	NO
						Attach if required
3	Date					
	Time					
	Load Returned to Origin					
	YES				YES	YES
	NO				NO	NO
					Waste operator contacted	NO
					Images available of waste type	NO
					Copy of email sent to waste operator	NO
						Attach if required
4	Date					
	Time					
	Load Returned to Origin					
	YES				YES	YES
	NO				NO	NO
					Waste operator contacted	NO
					Images available of waste type	NO
					Copy of email sent to waste operator	NO
						Attach if required
5	Date					
	Time					
	Load Returned to Origin					
	YES				YES	YES
	NO				NO	NO
					Waste operator contacted	NO
					Images available of waste type	NO
					Copy of email sent to waste operator	NO
						Attach if required
6	Date					
	Time					
	Load Returned to Origin					
	YES				YES	YES
	NO				NO	NO
					Waste operator contacted	NO
					Images available of waste type	NO
					Copy of email sent to waste operator	NO
						Attach if required
7	Date					
	Time					
	Load Returned to Origin					
	YES				YES	YES
	NO				NO	NO
					Waste operator contacted	NO
					Images available of waste type	NO
					Copy of email sent to waste operator	NO
						Attach if required
8	Date					
	Time					
	Load Returned to Origin					
	YES				YES	YES
	NO				NO	NO
					Waste operator contacted	NO
					Images available of waste type	NO
					Copy of email sent to waste operator	NO
						Attach if required

BD Inspection = Back Door Inspection of the Waste inside waste vehicle

All Tipping Floor Managers are to sign off shift with completed Waste Inspection sheets for the shift:

Signed by Shift Supervisor:

**Appendix 4**



Headquarters  
P.O. Box 3000  
Johnstown Castle Estate  
County Wexford  
Ireland

TECHNICAL AMENDMENT C  
TO  
INDUSTRIAL EMISSIONS LICENCE

<b>Licence Register Number:</b>	W0232-01
<b>Company Registration Number:</b>	399060
<b>Licensee:</b>	Dublin Waste to Energy Limited
<b>Location of Installation:</b>	Pigeon House Road Poolbeg Dublin 4



## ***Reasons for the Decision***

The Environmental Protection Agency is satisfied, on the basis of the information available, that subject to compliance with the conditions of Licence Reg. No. W0232-01 granted on 1 December 2008, (and amended on 27 March 2018, 11 April 2017 and 7 January 2014) as well as any amendments noted herein, any emissions from the activity will comply with and not contravene any of the requirements of Section 83(5) of the Environmental Protection Agency Act 1992 as amended.

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activity, individually or in combination with other plans or projects is likely to have a significant effect on any European Site. In this context, particular attention was paid to the European Site(s) listed in Appendix 1.

The activity is not directly connected with or necessary to the management of any European Site and the Agency considered, for the reasons set out below, that it can be excluded, on the basis of objective information, that the activity, individually or in combination with other plans or projects, will have a significant effect on any European Site and accordingly determined that an Appropriate Assessment of the activity was not required. This determination is based on the fact that the proposed amendment will not result in a material change to the nature of the discharges or the activity.

## ***Technical Amendment***

In pursuance of the powers conferred on it by Section 96(1)(c) of the Environmental Protection Agency Act 1992 as amended, the Agency amends the licence, granted to Dublin Waste to Energy Limited, Arthur Cox Building, Earlsfort Terrace, Dublin 2, for an installation located at Pigeon House Road, Poolbeg, Dublin 4.

Henceforth, the licence shall be read in conjunction with a Section 82A(11) Amendment issued on 7 January 2014 and Amendment A issued on 11 April 2017, and Amendment B issued on 27 March 2018 and the amendments set out below.

This technical amendment is limited to the following *Schedule A: Limitations*:

*Ty*

## Amendments

### Amended Schedules

**A.1 Waste Categories and Quantities for Acceptance at the Incineration plant**

Maximum annual quantity to be accepted shall not exceed: 600,000 tonnes.

Waste Type	List of Waste Catalogue (LoW) <sup>Note 1</sup>	Maximum annual Tonnage <sup>Note 3</sup>
<b>Non-hazardous residual waste</b> <sup>Note 1</sup>		
Mixed municipal waste <sup>Note 1</sup>	20 03 01	500,000
Waste from markets	20 03 02	
Street-cleaning residues	20 03 03	
Bulky waste	20 03 07	
Wastes from aerobic treatment of solid waste <sup>Note 2</sup>	19 05 01	
Combustible waste (refuse derived fuel) <sup>Note 2</sup>	19 12 10	
Sludges from treatment of urban waste water <sup>Note 4</sup>	19 08 05	
<b>Commercial, &amp; Industrial wastes</b> <sup>Note 5</sup>	02 01 03, 02 01 04, 02 01 07, 02 02 02, 02 02 03, 02 03 02, 02 03 03, 02 03 05, 02 05 01, 02 06 01, 02 06 02, 02 07 01, 02 07 02, 02 07 03, 02 07 04, 02 07 05, 03 01 01, 03 01 05, 03 03 01, 03 03 07, 03 03 08, 04 02 09, 04 02 10, 04 02 15, 04 02 17, 04 02 21, 04 02 22, 06 05 03, 07 02 13, 08 01 12, 08 01 18, 08 01 20, 08 03 08, 08 03 13, 08 04 10, 08 04 16, 12 01 05, 15 01 09, 15 02 03, 16 01 03, 16 01 19, 16 01 22, 16 03 04, 16 03 06, 19 02 03, 19 02 10, 19 05 02, 19 05 03, 19 08 01, 19 08 09, 19 10 04, 19 10 06, 19 12 01, 19 12 04, 19 12 07, 19 12 08, 19 12 12, 07 05 12, 07 02 12.	100,000
<b>Total</b>		600,000

Note 1: See Glossary of Terms.

Note 2: Derived from the treatment of the residual waste fraction of mixed municipal waste.

Note 3: The individual limitation on waste streams may be varied with the agreement of the Agency subject to the overall total limit of 600,000 tonnes staying the same.

Note 4: Annual tonnage shall not exceed 10,000. This may be increased to a maximum of 80,000 tonnes annually subject to the submission of a detailed assessment report to the Agency and written approval of the Agency.

Note 5: Annual tonnage shall be limited to 10,000 per individual waste code. This may be increased with the written agreement of Agency.

This Technical amendment shall be cited as Amendment C to the licence.

**Sealed by the Seal of the Agency on this the 25<sup>th</sup> day of April, 2019**

**PRESENT when the seal of the Agency was affixed hereto**

*Tara Gillen*  
\_\_\_\_\_  
**Tara Gillen, Authorised Person**

TG



Jennifer Cope,  
EPA licensing,  
Environmental Protection Agency,  
Richview,  
McCumisky House,  
Clonskeagh,  
Dublin 14.

Date: 13<sup>th</sup> January 2023

**RE: Waste License Application W0232-02- Unsolicited Information- Revised Schedule A.1**

Dear Ms. Cope,

Dublin Waste to Energy Limited hereby encloses a revised EWC code list for the IE license review application W0232-02. This supersedes the previous Schedule A.1 table previously submitted.

The codes highlighted in green are the current EWC codes as per W0232-01 and the codes highlighted in blue are the new codes requested to be added.

If you require anything further, please do not hesitate to contact the undersigned.

Yours Sincerely,

Mark Heffernan,  
Environmental Manager,  
Covanta Europe Operations Limited  
For and on behalf of  
Dublin Waste to Energy Limited.

Table 4. Proposed Revised Schedule A.1.

Maximum annual quantity to be accepted shall not exceed: 690,000 tonnes

Waste Type	European Waste Catalogue (EWC) <sup>Note 1</sup>	Maximum Annual Tonnage <sup>Note 3</sup>
<b>Non-hazardous Residual Waste</b>		
Mixed Municipal Waste <sup>Note 1</sup>	20 03 01	625,000
Wastes from Markets	20 03 02	
Street Cleaning Residues	20 03 03	
Bulky Waste	20 03 07	
Wastes from Aerobic Treatment of solid waste <sup>Note 2</sup>	19 05 01	
Sludges from treatment of urban wastewater <sup>Note 4</sup>	19 08 05	
Combustible waste (refuse derived fuel) <sup>Notes 2</sup>	19 12 10	10,000
<b>Commercial &amp; Industrial Wastes</b> <sup>Note 5</sup>	02 01 02 02 01 03 02 01 04 02 01 06 02 01 07 02 02 02 02 02 03 02 02 04 02 03 02 02 03 04 02 03 05 02 05 01 02 05 02 02 06 01 02 06 02 02 06 03 02 07 01 02 07 04 02 07 05 03 03 08 04 02 09 04 02 21 04 02 22 06 05 03 07 01 12 07 02 12 07 04 12 07 05 12 07 07 12 08 01 12 08 01 18 08 01 20 08 03 08 08 03 13 08 03 18 12 01 05 15 02 03 16 01 19 16 01 22 16 03 04 16 03 06 17 06 04 18 01 04 18 01 09 18 02 08 19 02 03 19 02 10 19 05 02 19 05 03 19 06 04 19 06 06 19 08 01 19 08 09 19 08 12 19 08 14 19 09 05 19 10 04 19 10 06 19 12 01 19 12 04 19 12 07 19 12 08 20 01 28 20 01 30 20 01 32 20 02 03	100,000
Waste from Mechanical Treatment of Waste <sup>Note 2</sup>	19 12 12	150,000

**Note 1:** See IE license Glossary of terms

**Note 2:** Derived from the treatment of the residual fraction of mixed municipal waste

**Note 3:** The individual limitation on waste streams may be varied with the Agreement of the Agency subject to the overall total limit of 690,000 tonnes staying the same.

**Note 4:** Annual tonnage shall not exceed 10,000 tonnes. This may be increased to a maximum of 80,000 tonnes annually subject to the submission of a detailed assessment report to the Agency and written approval of the Agency.

**Note 5:** Annual tonnage shall be limited to 12,000 tonnes per individual waste code. This may be increased with the written agreement of the Agency.



European Waste Catalogue (EWC)	Waste Type	As per IE License W0232-01	New EWC code for W232-02
20 03 01	Mixed Municipal Waste		
20 03 02	Waste From Markets		
20 03 03	Street Cleaning Residues		
20 03 07	Bulky Waste		
19 05 01	Waste from the aerobic treatment of solid wastes		
19 08 05	Sludges from treatment of urban wastewater		
19 12 10	Combustible Waste (refuse derived fuel)		
<b>Commercial and Industrial Wastes</b>			
<b>02 01 -Wastes from Agriculture, Horticulture, aquaculture, forestry, hunting and fishing</b>			
02 01 02	Animal-tissue waste		
02 01 03	Plant tissue waste		
02 01 04	Waste plastics (except packaging)		
02 01 06	Animal faeces, urine, and manure (including spoiled straw), effluent, collected separately and treated off site		
02 01 07	Waste from forestry		
<b>02 02 Waste from the preparation and processing of meat, fish, and other foods of animal origin</b>			
02 02 02	Animal tissue waste		
02 02 03	Materials unsuitable for consumption or processing		
02 02 04	Sludges from on-site effluent treatment		
<b>02 03 Wastes from fruit, vegetables, cereals edible oils, cocoa, coffee, tea and tobacco preparation and processing: conserve production, yeast and yeast extract production, molasses preparation and fermentation.</b>			
02 03 02	Wastes from preserving agents		
02 03 04	Materials unsuitable for consumption or processing		
02 03 05	Sludges from on-site effluent treatment		

<b>02 05 Wastes from the dairy products industry</b>			
02 05 01	Materials unsuitable for consumption or processing		
02 05 02	Sludges from on-site effluent treatment		
<b>02 06 Wastes from the baking and confectionery industry</b>			
02 06 01	Materials unsuitable for consumption or processing		
02 06 02	Wastes from preserving agents		
02 06 03	Sludges from on-site effluent treatment		
<b>02 07 Wastes from the production of alcoholic and non-alcoholic beverages (except tea, coffee, and cocoa)</b>			
02 07 01	Wastes from washing, cleaning, and mechanical reduction of raw materials		
02 07 04	Materials unsuitable for consumption or processing		
02 07 05	Sludges from on-site effluent treatment		
<b>03- Wastes from wood processing and the production of panels and furniture, pulp, paper, and cardboard</b>			
03 03 Wastes from pulp, paper and cardboard production and processing			
03 03 08	Wastes from sorting of paper and cardboard destined for recycling		
<b>04 – Wastes from the leather fur and textile industry</b>			
<b>04 02 Wastes from the textile industry</b>			
04 02 09	Waste from composite materials (impregnated textile, elastomer, plastomer)		
04 02 21	Wastes from unprocessed textile fibres		
04 02 22	Wastes from processed textile fibres		
<b>06 – Wastes from inorganic chemical processes</b>			
<b>06 05 - Sludges from on-site effluent treatment</b>			
06 05 03	Sludges from on-site effluent treatment other than those mentioned 06 05 02		
<b>07 – Wastes from organic chemical processes</b>			

<b>07 01 – Wastes from the manufacture, formulation, supply, and use (MFSU) of basic organic chemicals</b>			
07 01 12	Sludges from on-site effluent treatment other than those mentioned 07 01 11		
<b>07 02 Wastes from the MFSU of plastics, synthetic rubber, and man-made fibres</b>			
07 02 12	Sludges from on-site effluent treatment other than those mentioned 07 02 11	EPA Approved by T/A 25/4/2019	
<b>07 04 Wastes from the MFSU of organic plant protection products (except 02 01 08 and 02 01 09) wood preserving agents (except 03 02) and other biocides</b>			
07 04 12	Sludges from on-site effluent treatment other than those mentioned 07 04 11		
<b>07 05 Wastes from the MFSU of pharmaceuticals</b>			
07 05 12	Sludges from on-site effluent treatment other than those mentioned 07 05 11	EPA Approved by T/A 25/4/2019	
<b>07 07 Wastes from the MFSU of fine chemicals and chemicals products not otherwise specified</b>			
07 07 12	Sludges from on-site effluent treatment other than those mentioned 07 07 11		
<b>08 – Wastes from the manufacture, formulation, supply, and use of (MFSU) of coatings (paints, varnishes, and vitreous enamels), adhesives, sealants, and printing inks</b>			
<b>08 01 Wastes from MFSU and removal of paint and varnish</b>			
08 01 12	Waste paint and varnish other than those mentioned in 08 01 11		
08 01 18	Waste from paint or varnish removal other than those mentioned in 08 01 17		
08 01 20	Aqueous suspensions containing paint or varnish other than those mentioned in 08 01 19		

<b>08 03 Wastes from the MFSU of printing inks</b>			
08 03 08	Aqueous liquid waste containing ink		
08 03 13	Waste ink other than those mentioned in 08 03 12		
08 03 18	Waste printing toner other than those mentioned in 08 03 17		
<b>12 - Wastes from shaping and physical and mechanical surface treatment of metals and plastics</b>			
12 01 05	Plastic shavings and turnings		
<b>15 – Waste Packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified</b>			
<b>15 02 – Absorbents, filter materials, wiping cloths and protective clothing</b>			
15 02 03	Absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02		
<b>16 – Wastes not otherwise specified in the list</b>			
<b>16 01 – End of life vehicles from different means of transport (including off road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14,16 06 and 16 08)</b>			
16 01 19	Plastic		
16 01 22	Components not otherwise specified		
<b>16 03 – Off specification batches and unused products</b>			
16 03 04	Inorganic wastes other than those mentioned in 16 03 03		
16 03 06	Organic wastes other than those mentioned in 16 03 05		
<b>17 Construction and Demolition wastes (including excavated soil from contaminated sites)</b>			
<b>17 06 – Insulation materials and asbestos containing construction materials</b>			
17 06 04	Insulation materials other than those mentioned in 17 06 01 and 17 06 03		

<b>18 – Wastes from human or animal health care and/or related research (except kitchen and restaurant wastes not arising from immediate health care.)</b>			
<b>18 01 -Wastes from natal care, diagnosis, treatment, or prevention of disease in humans</b>			
18 01 04	Wastes whose collection and disposal is not subject to special requirements to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers)		
18 01 09	Medicines other than those mentioned in 18 01 08		
<b>18 02 Wastes from research, diagnosis, treatment, or prevention of disease involving animals</b>			
18 02 08	Medicines other than those mentioned in 18 02 07		
<b>19 – Wastes from waste management facilities, off-site wastewater treatment plants and the preparation of water intended for human consumption and water for industrial use</b>			
<b>19 02 – Wastes from physio/chemical treatments of waste (including dechromatation, decyanidation, neutralisation</b>			
19 02 03	Premixed Wastes composed only of non-hazardous wastes		
19 02 10	Combustible wastes other than those mentioned in 19 02 08 and 19 02 09		
<b>19 05 – Wastes from aerobic treatment of waste</b>			
19 05 02	Non composted fraction of animal and vegetable waste		
19 05 03	Off specification compost		
<b>19 06 – Wastes from anaerobic treatment of waste</b>			
19 06 04	Digestate from anaerobic treatment of municipal waste		
19 06 06	Digestate from anaerobic treatment of animal and vegetable waste		

<b>19 08 – Wastes from wastewater treatment plants not otherwise specified</b>			
19 08 01	Screenings		
19 08 09	Grease and oil mixture from oil/water separation containing only edible oil and fats		
19 08 12	Sludges from biological treatment of industrial wastewater other than those mentioned in 19 08 11		
19 08 14	Sludges from other treatment of industrial wastewater other than those mentioned in 19 08 13		
<b>19 09 – Wastes from preparation of water intended for human consumption or water for industrial use</b>			
19 09 05	Saturated or spent ion exchange resins		
<b>19 10 – Wastes from shredding of metal containing wastes</b>			
19 10 04	Fluff-light fraction and dust other than those mentioned in 19 10 03		
19 10 06	Other fractions other than those 19 10 05		
<b>19 12 – Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>			
19 12 01	Paper and cardboard		
19 12 04	Plastic and rubber		
19 12 07	Wood other than that mentioned in 19 12 06		
19 12 08	Textiles		
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11		

<b>20 Municipal Waste (Household waste and similar commercial, industrial and Institutional wastes) including separately collected fractions</b>			
<b>20 01 – Separately collected fractions (except 15 01)</b>			
20 01 28	Paint, inks, adhesives, and resins other than those mentioned in 20 10 27		
20 01 30	Detergents other than those mentioned in 20 01 29		
20 01 32	Medicines other than those mentioned in 20 01 31		
<b>20 02 – Garden and park wastes (including cemetery waste)</b>			
20 02 03	Other non-biodegradable wastes		



## Appendix 5



**FAO: Mr. Ollie Gray,  
Office of Environmental Enforcement,  
Environment Protection Agency,  
Richview,  
McCumisky House,  
Clonskeagh  
Dublin 14.**

**30<sup>th</sup> July 2019**

**Ref: W0232-01: Reduction in FGTR Sampling**

Dear Mr. Gray,

In addition to submission LR042063, Dublin Waste to Energy submits the attached evidence to confirm that the required standards were adhered to with reference to the reduction in sampling of FGTR. The distribution, variation and frequency have been analysed and established having regard to the following standards, as appropriate:

- BS EN 14899:2005. Characterisation of waste - Sampling of waste materials – Framework for the preparation and application of a sampling plan.
- CEN/TR 15310:2006 Parts 1-5. Characterisation of waste - Sampling of waste materials

The attached report concludes that the sampling of FGTR at the DWTE facility can be reduced to quarterly.

I trust the approval for the reduction in FGTR sampling to quarterly will be issued by return.

If you require anything further, please do not hesitate to contact the undersigned.

Yours Sincerely,



Mark Heffernan  
Environmental Manager.



## Licence Return Approval Notice

**Licence:** W0232-01 - Dublin Waste to Energy Limited

**Submitted On:** 02/09/2019

**Licensee Submission** LR043423 **Title** Schedule C.4.1 FGTR

### Notification

Dear Mr Heffernan,

The Agency has reviewed your submission LR043423, in conjunction with LR042063, regarding a reduction in the sampling frequency of flue gas treatment residue at the Dublin Waste to Energy Facility, Industrial Emissions (IE) Licence Reg. No. W0232-01.

The submission has been evaluated having regard for Conditions 6.3 and 6.14 and Schedule C.4.1 "Monitoring of incinerator residues" of the licence.

On the basis of the information provided, the Agency agrees for the flue gas treatment residue sampling frequency to be reduced from per consignment to quarterly.

You are reminded of the requirement to comply with the conditions of IE Licence Reg. No. W0232-01 at all times.

The Agency may at any time, if it considers necessary, revisit and/or revoke this approval.

Yours sincerely,

Ollie Gray

Office of Environmental Enforcement, Dublin

Tel: (01) 2680100

