

Indaver Ireland Limited

IE Licence Review Application

IED Article 52 Compliance

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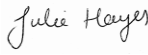


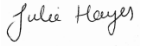


This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1. Compliance with Industrial Emissions Directive (IED) Article 52

1.1 Article 52 (1)

1. The operator of the waste incineration plant or waste co-incineration plant shall take all necessary precautions concerning the delivery and reception of waste in order to prevent or to limit as far as practicable the pollution of air, soil, surface water and groundwater as well as other negative effects on the environment, odours and noise, and direct risks to human health.

All trucks delivering waste to the site will be covered vehicles. Only permitted waste collectors are allowed to deliver waste to the site. This is controlled as part of the waste acceptance and waste handling procedures for the Meath site, which are included as Attachment 4-3-5(1) and 4-3-5(2) of this application.

The bunker and tipping hall are enclosed with negative air pressure to mitigate against dust and odour emissions. The tipping hall has a concrete floor which drains to the bunker with no link to the main stormwater drainage network on site. The bunker is concrete structure which is compartmentalised and designed to retain any leachate from the waste stored. All process activities at the site, including receipt and handling of materials at the bunker, are carried out by trained operators. A visual inspection of waste is carried out as it is unloaded at the bunker.

Liquid wastes for treatment are unloaded in a concrete contained area by pumping directly to a double-skinned tank or via direct injection to the furnace itself. The proposed development will replace the existing double-skinned tank with two single-skinned tanks contained within a bund. Direct injection to the furnace from incoming waste tanker deliveries will also be possible. Bulk liquid wastes arriving in tankers for treatment shall be introduced to the furnace by way of direct injection.

The waste acceptance areas and the site are generally maintained in a clean and tidy state and regular litter patrols on the site by facility staff will ensure that this is maintained. The waste handling procedure contained in Attachment 4-3-5(2) and the BAT assessments completed for Waste Incineration, Emissions from Storage and Waste Treatment demonstrate the measures that will be employed for both solid and liquid wastes in order to meet the requirements of this Article.

Under Condition 3.19 of the existing IE Licence (W0167-03), the incineration plant is subject to a test programme to validate performance of the plant under the extended range of waste streams. This test programme has been completed for the range of hazardous wastes accepted by the plant. The licensee propose that test programme is repeated as necessary or as otherwise agreed with the Agency as new wastes of different EWC codes are proposed to be accepted.

1.2 Article 52 (2)

2. The operator shall determine the mass of each type of waste, if possible according to the European Waste List established by Decision 2000/532/EC, prior to accepting the waste at the waste incineration plant or waste co-incineration plant.

All deliveries of waste are registered at the gatehouse upon arrival. The weight of each delivery is automatically recorded at separate weighbridges by weighing trucks at the 'in' and 'out' weighbridges. This process is detailed in the waste handling procedure (Attachment 4-3-5(2)) and the Operational Report (Attachment 4-8-1).

1.3 Article 52 (3)

3. Prior to accepting hazardous waste at the waste incineration plant or waste co-incineration plant, the operator shall collect available information about the waste for the purpose of verifying compliance with the permit requirements specified in Article 45(2).

That information shall cover the following:

(a) all the administrative information on the generating process contained in the documents mentioned in paragraph 4(a);

The waste acceptance and handling procedures contained in Attachment 4-3-5(1) and 4-3-5(2) detail the measures implemented for controlling hazardous waste deliveries to the site. These include the following:

- Only hazardous wastes from known sources and process will be considered for acceptance.
- Detailed characterisation and classification of the waste is undertaken in advance to ensure the LoW code is assigned and permitted for acceptance at the facility. The correct transport classification is assigned (if applicable).
- Hazardous wastes are approved by production prior to acceptance.
- Paperwork for such deliveries will be checked on arrival to ensure conformity.
- All industrial wastes including hazardous wastes are assessed for three specific criteria. The waste must fulfil the criteria of licence, suitability for the plant and cause no additional health and safety concerns.

Records of off-site waste profiling and characterisation shall be retained by the licensee for all active customers until termination of licensee / customer agreements.

(b) the physical, and as far as practicable, chemical composition of the waste and all other information necessary to evaluate its suitability for the intended incineration process;

The waste acceptance and handling procedure contained in Attachment 4-3-5(1) and 4-3-5(2) details the measures to be implemented for classifying hazardous waste deliveries to the site.

The correct classification is then compared to the waste acceptance criteria, any limits on specific chemical constituents contained in any schedules to the IE licence and if acceptable, the waste is proposed to the process engineer at the plant for acceptance.

The process engineer has the final say in whether the waste is to be accepted or not at the facility.

(c) the hazardous characteristics of the waste, the substances with which it cannot be mixed, and the precautions to be taken in handling the waste.

The process engineer has the final say in whether a hazardous waste is to be accepted or not at the facility. He/she will also identify any compatibility issues and will also seek advice on any particular precautions to be taken for waste handling as outlined in the waste handling procedure in Attachment 4-3-5(1) and 4-3-5(2).

1.4 Article 52 (4)

4. Prior to accepting hazardous waste at the waste incineration plant or waste co-incineration plant, at least the following procedures shall be carried out by the operator:

(a) the checking of the documents required by Directive 2008/98/EC and, where applicable, those required by Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste (37) and by legislation on transport of dangerous goods;

The checking of documents upon arrival at the installation for hazardous waste deliveries is performed each time for every load. The gatehouse staff check the paperwork supplied with the vehicle matches the available information on the SAP (ERP) system and record specific information such as date and time, name of carrier, registration number, description and quantity of waste etc.

Once wastes are confirmed to be acceptable, they are weighed and continue to be processed on site. The records of waste are submitted to the planning authority on a monthly basis.

Full details are included in the waste handling procedure in Attachment 4-3-5(2).

(b) the taking of representative samples, unless inappropriate as far as possible before unloading, to verify conformity with the information provided for in paragraph 3 by carrying out controls and to enable the competent authorities to identify the nature of the wastes treated.

The samples referred to in point (b) shall be kept for at least 1 month after the incineration or co-incineration of the waste concerned.

Representative samples are taken in advance (where practical) and analysed for compliance prior to agreeing to accept a hazardous waste stream from a known source. All hazardous liquid waste deliveries are analysed prior to unloading at the facility.

A detailed liquid analysis to confirm compliance with the licence acceptance requirements (Waste Acceptance Criteria or WAC check) is performed for all new waste liquid streams. A conformity check sample is required for each hazardous load or batch. Conformity check samples are tested for water content, layering, CV, pH and chlorine to ensure the waste stream has not changed since the initial WAC was carried out.

This is detailed in the waste handling procedure (Attachment 4-3-5(2)).

1.5 Article 52 (5)

5. The competent authority may grant exemptions from paragraphs 2, 3 and 4 to waste incineration plants or waste co-incineration plants which are a part of an installation covered by Chapter II and only incinerate or co-incinerate waste generated within that installation.

This is not applicable to the Indaver Meath site.