

EPA Application Form

9.1 - Environmental Management Techniques - Attachment

Organisation Name: *

Donegal County Council

Application I.D.: *

LA10728

Authorisation Application Form

Amendments to this Application Form Attachment

Version No.	Date	Amendment since previous version	Reason
V.1.0	July 2017	N/A	Online application form attachment
As above	Mar 2018	Identification of required fields	Assist correct completion of attachment

9 Environmental Management Techniques¹

9.1. Accident Prevention Measures

Measures to prevent accidental emissions and liabilities

Incidents and accidents are unplanned events. Emissions from incidents and (major) accidents usually occur within a relatively short time frame but with greater intensity than under normal operating conditions. Incidents such as fire or fuel spillages can result in liabilities such as contaminated soil and groundwater. Proactive risk management reduces the potential for an incident.

Abnormal operating conditions must be managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants or animals, without causing a nuisance through noise or odours, and without adversely affecting the countryside or places of special interest.

The applicant must firstly undertake a risk assessment in accordance with EPA guidance on assessing and costing environmental liabilities. Having identified the key risks, the applicant should populate the following table with the measures to be taken to treat the key risks, e.g., bunding, integrity testing, fire prevention, etc.

The range of measures is dependent on the complexity of the site. Pollution prevention measures may, inter alia, include the following information:

- Conclusions on BAT set out in the EU Reference document on BAT on emissions from storage such as a safety management system; corrosion prevention measures on tanks, etc.
- Details of storage of all raw materials, products and wastes such as segregation, labelling, designation and impervious surface;
- Details of spill or emergency containment measures and structures such as bunds, high level alarms, absorbent materials;
- Details of fire detection and fire-water retention facilities in the event of emergencies or other measures to contain fire-water;
- Details of transport of material within the site, solid, liquid or sludge transported by pipe, vehicle or conveyor; etc.,
- The Agency has published a guidance document on Fire-Water Retention Facilities and on the Storage and transfer of materials.

¹ This part of the form collects information on environmental management at the installation/ facility. It seeks to understand the maturity of the management system in terms of knowledge of abnormal operating conditions, prevention and early detection measures and emergency response procedures. The level of detail required in this part of form relates to the environmental risk posed.

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Describe in the table below existing and/or proposed measures, including emergency procedures, to minimise the impact on the environment of an accidental emission or spillage. (This table should include the measures to be taken under abnormal operating conditions, including start-up, shutdown, leaks, malfunctions, breakdowns and momentary stoppages that will demonstrate that any emission arising will not cause significant environmental pollution)².

Measure *	Surveillance Measures		
	Description *	Frequency of Surveillance *	Method / Standard *
The site is closed Emergency response procedures OP02 (Date: October 2017) Emergency situations are identified as follows: <ul style="list-style-type: none"> • Fire • Landfill Gas • Plant breakdown • Significant spillages • Accident or injury 			

*add rows to the table as necessary

² Information relating to the integrity, impermeability and recent testing of pipes, tanks and bund areas should be included.

* indicates required field



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Outline what provisions have been made to ensure an adequate response to emergency situations outside of normal working hours, i.e., during night-time, weekends and holiday periods (attach additional pages to this document if required): *

An Environmental Management System (EMS) was submitted to the EPA during 2004 and approved. All, reports/records in relation to the facility are maintained at Donegal County Council's Environmental Section, County House Lifford, Co Donegal.
Emergency response procedure for fire was updated in 2017 as requested by OEE. Donegal County Council will maintain EMS for the aftercare of the site.

Soil Monitoring Points

Periodic monitoring of soil and groundwater is required having regard to the possibility of soil and groundwater contamination of the site³.

Complete the table below with details of soil monitoring locations and in particular where a baseline report has been/is required in accordance with Section 86B of the EPA Act 1992 as amended.

Is periodic soil monitoring proposed at the installation/facility? (Yes/No): *

No

Soil Monitoring Point Code	Monitoring Point Grid Ref.	
	Easting ⁴	Northing ⁵

*add rows to the table as necessary

Soil Parameters

-
- 3 Inherent in the monitoring of soil and groundwater is accepting the possible necessity for remediation of the soil / groundwater. Regular monitoring of soil and groundwater provides an early detection of any contaminations.
 - 4 Six Digit GPS Irish National Grid Reference
 - 5 Six Digit GPS Irish National Grid Reference

* indicates required field



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Complete the table below with details of soil monitoring parameters (where a baseline report is required in accordance with Section 86B of the EPA Act 1992 as amended). (If different parameters are associated with different monitoring points this should also be identified in the table below.)

Parameter	Unit	Trigger Level	How was the trigger level determined?	Proposed Monitoring Frequency	Sample Method	Analysis Method / Technique

*add rows to the table as necessary

* indicates required field



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Groundwater Monitoring Points

Based on the assessment(s) carried out previously or as part of this licence application, complete the table below with summary details of the groundwater monitoring points.

Is groundwater monitoring proposed at the installation/facility? (Yes/No): *

Yes

Monitoring Point Code	Monitoring Point Grid Ref.	
	Easting ⁶	Northing ⁷
BH1 (GW1)	395751.22	231070.44
BH2 (GW3)	396131.65	230844.89
BH3 (GW4)	396039.56	230813.86
Two wells to be installed as per condition 6.19		

*add rows to the table as necessary

⁶ Six Digit GPS Irish National Grid Reference

⁷ Six Digit GPS Irish National Grid Reference

* indicates required field



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Groundwater Parameters

Complete the table below with summary details of the groundwater parameters. (If different parameters are associated with different monitoring points this should be identified in the table below.)

Parameter	Unit	Trigger Level	How was the trigger level determined?	Proposed Monitoring Frequency	Sample Method	Analysis Method / Technique
Parameters as per existing licence W0062-02 Table C.5 Groundwater Monitoring Parameters /Frequency		None		Monthly groundwater level to quarterly. Quarterly hazardous compounds, metals/non metals to annually as agreed LR068825 Remaining parameters quarterly as per existing licence W0062-02 Table C.5 Groundwater Monitoring Parameters /Frequency	As per current licence	As per current licence

*add rows to the table as necessary

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Costed Environmental Liabilities Risk Assessment (ELRA)

Indicate if the activity, through pre-application meeting with the Agency or other means, is required to submit a costed ELRA⁸ as part of the licence, or licence review application.

Costed Environmental Liabilities Risk Assessment (ELRA) required to be submitted? (Yes/No): *

If 'Yes', upload a costed Environmental Liabilities Risk Assessment (ELRA), prepared in accordance with the *Environmental Protection Agency's Guidance on Assessing and Costing Environmental Liabilities* (2014) (select Document Type: 'ELRA' in the application form).

Costed **ELRA** document filename:

Indicate your preferred form of financial provision instrument to meet ELRA costings have regard to the Environmental Protection Agency's Guidance on Financial Provision (2015), e.g., Environmental Liability Insurance:

Upload a financial provision proposal have regard to the Environmental Protection Agency's Guidance on Financial Provision (2015) (where required at application /review application stage) (select Document Type: 'Financial Provision Proposal' in the application form)

Financial Provision Proposal filename:

⁸ There is an explicit requirement in EU and Irish law for financial provision for certain activities. The following categories of activities have an ELRA/CRAMP/FP requirement:

1. Landfills (excl. closed L.A. Landfills closed before 16th July 2009)
2. CAT A Extractive Waste Facilities
3. High Risk Contaminated Land Facilities
4. All Haz-Waste Transfer Stations
5. Non-Haz WTS (Accepting >50,000 tons/annum)
6. Incineration (incl. co-incineration of hazardous waste)
7. Upper & Lower Tier Seveso Sites
8. Exceptional circumstances associated with the site, e.g., significant ground/groundwater contamination.

Regard should be had by applicants to relevant Agency guidance on these matters.

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Closure, Restoration and Aftercare Management Plan (CRAMP)

A restoration/aftercare period will be required where there are on-going environmental liabilities following closure. Applicants are required to describe the existing or proposed measures to avoid any risk of environmental pollution and to return the site to a satisfactory state or the state established in the baseline report where applicable, after the activity or part of the activity ceases operation.

A key measure is the preparation of a Closure, Restoration and Aftercare Management Plan (CRAMP) by the operator, for certain activities⁹. Notwithstanding the requirements of the EC Environmental Objectives (Groundwater) Regulations 2010, S.I. No. 9 of 2010, the closure and restoration/ aftercare target is the site condition at the time of the original application or the baseline report. The applicant shall have regard to the Environmental Protection Agency's Guidance on Assessing and Costing Environmental Liabilities (2014) in the preparation of the CRAMP.

Upload a CRAMP, where applicable (select Document Type: '**Site Closure**' in the application form).

CRAMP filename:

IBR1363 RAMP.pdf

Costed CRAMP

Indicate if the activity, through pre-application meeting with the Agency or other means, is required to have a CRAMP⁹ submitted as part of the licence, or licence review application.

CRAMP required to be submitted at application/licence review application stage? (Yes/No): *

⁹ There is an explicit requirement in EU and Irish law for financial provision for certain activities. The applicant shall have regard to the Environmental Protection Agency's Guidance in determining CRAMP requirements and on Financial Provision (2015) in making financial provision to cover any liabilities.

The following categories of activities have an ELRA/CRAMP/FP requirement:

1. Landfills (excl. closed L.A. Landfills closed before 16th July 2009)
2. CAT A Extractive Waste Facilities
3. High Risk Contaminated Land Facilities
4. All Haz-Waste Transfer Stations
5. Non-Haz WTS (Accepting >50,000 tons/annum)
6. Incineration (incl. co-incineration of hazardous waste)
7. Upper & Lower Tier Seveso Sites
8. Exceptional circumstances associated with the site e.g. significant ground/groundwater contamination.



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Indicate your preferred form of financial provision instrument to meet CRAMP costings (where appropriate), e.g., Secured fund, On-demand performance Bond, Parent Company Guarantee, Charge on Property (have regard to the Environmental Protection Agency's Guidance on Financial Provision (2015) on the Agency's website):

State preferred form of financial provision instrument? Form of assurance has been submitted on EDEN as per LR068825

Upload a financial provision proposal (where required) having regard to the Environmental Protection Agency's Guidance on Financial Provision (2015) in making financial provision to cover any liabilities (select Document Type: **Financial Provision Proposal** in the application form)

Financial Provision Proposal filename: Form of assurance has been submitted on EDEN as per LR068825

Cessation of Activity

Where a CRAMP is not required, describe the measures to be taken on and following the permanent cessation of the activity or part of the activity to avoid any risk of environmental pollution and to return the site of the activity to a satisfactory state. (Input your response in the text box below or attach the information in to this attachment).

Emergency Response Procedure

Do you have an emergency response procedure (ERP)? (Yes/No) *

Is the ERP compliant with the EPA guidance? (Yes/No) *

* indicates required field

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9.2. Nuisance

Complete the table below in relation to each potential nuisance. Identify if the activity may cause or contribute to the type of nuisance in the area of the installation/facility and, where applicable, identify the techniques used to prevent/minimise the nuisance.

Type of Nuisance	Applicable to the activity? * (Yes/No/ Not Applicable)	Techniques to prevent nuisances *	Where nuisances cannot be prevented, techniques to be used to minimise and reduce nuisances
Odour	Not Applicable		
Fire Control	Not Applicable		
Dust	Not Applicable		
Litter	Not Applicable		
Birds	Not Applicable		
Mud	Not Applicable		
Flies	Not Applicable		
Vermin	Not Applicable		
Other	Not Applicable		

If 'Other' is selected define the other nuisance(s):

Note: Odour must also be addressed in the fugitive emissions section of the '7.4 Emissions to Atmosphere – Main and Fugitive' template, where applicable.



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9.3. Environmental Management System (EMS)

Do you have an environmental management system? (Yes/No) *

If 'Yes', is the environmental management system accredited? (Yes/No) *

State the date accreditation was achieved or is expected to be achieved, where applicable:

State the standard of accreditation achieved:

Energy Efficiency

Outline the measures taken to ensure that energy is used efficiently having regard to the relevant decision on BAT conclusions and/or BAT guidance and where appropriate, an energy audit with reference to the EPA Guidance document on Energy Audit should be carried out. *

The site is closed. Leachate is pumped from the site to the ICW for treatment prior to discharge to the River Finn. Leachate is extracted from 3 No. Pumping stations (Sump 1, 2 and 3) on site as controlled by the SCADA system. Leachate is only pumped when leachate and capacity is available.

Has an energy audit been carried out? (Yes/No) *

Do you have an energy efficiency management system? (Yes/No) *

If 'Yes', is the energy efficiency management system accredited? (Yes/No)

State the date accreditation was achieved or is expected to be achieved, where applicable:

State the standard of accreditation achieved:

* indicates required field

9.4. Hours of Operation

Provide details of the hours of operation for the installation/facility * (hours and days per week, etc.), including:

(a) Proposed hours of operation.

Site is closed

(b) Proposed hours of construction and development works and timeframes.

As per existing licence. W0062-02

(c) For waste activities, the proposed hours of waste acceptance.

Site is closed

(d) Any other relevant hours of operation expected (e.g., waste handling, etc.).

Site is closed

9.5. Review of a Licence

Where the Office of Environmental Enforcement (OEE) has agreed any variations or adjustments to the conditions or schedules of the existing licence, the licensee must provide details of these agreed variations and adjustments to the existing licence conditions in the table that follows.

An updated, scaled drawing of the site layout (no larger than A3) providing visual information on such adjustments or variations where appropriate should be uploaded in the **site tab** – 'site plan(s)' upload.

In the case of once-off assessments/reports required under conditions/schedules of the existing licence the licensee must provide details of those assessments/reports that have been completed and agreed with the OEE or as otherwise agreed, in the table below.

Condition/ Schedule No.	Existing Condition	OEE Agreement Reference	Description
Schedule C	Emissions to Surface Water Schedule C.2.2 D1, D2, D3 & D4		<ul style="list-style-type: none"> • Emissions to surface water: <ul style="list-style-type: none"> ○ visual inspections/odour: daily to weekly ○ Weekly parameters: weekly to quarterly ○ Monthly parameters: to Annual ○ Metals: weekly to Annual ○ Organic compounds: monthly to annual
Schedule C	Pond Sediment Monitoring Schedule C.2.1 Ponds 1, 1A, 2A, 3A, 4A, 5A, 1B, 2B, 3B, 4B, 5B	LR068825	<ul style="list-style-type: none"> • Pond sediment monitoring <ul style="list-style-type: none"> ○ Amended to Annually then three years thereafter.
Schedule C	Leachate Monitoring Schedule C.2.3 Leachate sumps (1,2,& 3)	LR068825	<ul style="list-style-type: none"> • Leachate monitoring: <ul style="list-style-type: none"> ○ Daily inspections amended to weekly

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			<ul style="list-style-type: none"> ○ Level amended to Quarterly
Schedule C	Receiving Water Monitoring Schedule C.6 SW1, SW2, SW3, SW4, SW5, SW6, SW7	LR068825	<ul style="list-style-type: none"> ● Receiving waters <ul style="list-style-type: none"> ○ Weekly parameters amended to quarterly ○ metals/organic compounds: Quarterly amended to Annual
Schedule C	Groundwater Monitoring Schedule C.5 BH1, BH2 & BH3 Plus 2 proposed wells	LR068825	<ul style="list-style-type: none"> ● Groundwaters <ul style="list-style-type: none"> ○ Monthly groundwater level to quarterly ○ Haz compounds/metals: quarterly amended to annual

*add rows to the table as necessary

9.6 Environmental Management Techniques – Upload Files

State the number of 'upload files' referred to and named in this attachment document? *