BASELINE REPORT

TULLEKA TRADING UNLIMITED,
GRAIGUE,
BALLINAKILL,
CO. LAOIS

2025

ATTACHMENT 4.8.2

CURRENT LICENCE REF: P0710-03

Application Ref: LA015950

1.0 INTRODUCTION

This report has been prepared on behalf of Tulleka Trading Unlimtied in support of a licence review application to the EPA.

The purpose of the report is to meet the requirements of Article 22(2) of the Industrial Emissions Directive (2010/75/EU) and to determine whether or not a baseline report is required for the facility. This report has been prepared in line with the '*European Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on Industrial Emissions*' (2014/C 136/03) and forms part of the licence application.

2.0 REQUIREMENT FOR BASELINE REPORT

European Legislation

The Industrial Emissions Directive (2010/75/EU) or 'IED' entered into force within the European Union on the 6th January 2011. The IED is a recast of 7 pieces of legislation including the Integrated Pollution Prevention and Control Directive (2008/1/EC), the Waste Incineration Directive (2000/76/EC) and five other directives. The IE Directive had to be transposed into national legislation by Member States by 7 January 2013.

For industrial activities regulated by the IED, Article 22(2) of Chapter II of the IED states that:

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

"*The baseline report shall contain the information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definitive cessation of activities provided for under paragraph 3*".

"The baseline report shall contain at least the following information:

(a) Information on the present use and, where available on past uses of the site;

(b) Where available, existing information on soil and groundwater measurements that reflect the state at the time the report is drawn up or, alternatively, new soil and groundwater measurements having regard to the possibility of soil and groundwater contamination by those hazardous substances to be used, produced or released by the installation concerned.

Where information produced pursuant to other national or Union law fulfils the requirements of this paragraph that information may be included in, or attached to, the submitted baseline report.

The Commission shall establish guidance on the content of the baseline report."

The Commission has established guidance on the content of the baseline report in the form of '*European Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on Industrial Emissions*', which has been followed in the production of this report.

3.0 SCOPE OF THE REPORT

This report follows the stages set out in the *European Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on Industrial Emissions*" (2014/C 136/03).

The proposed substances to be used at the facility are listed in Stage 1, with those that are hazardous, identified in Stage 2. The possibility of soil and groundwater contamination by these hazardous substances is addressed in Stage 3 in the assessment of the site-specific pollution possibility.

Stage 1: Identification of Substances Used, Produced or Stored at the Development

It is necessary to determine whether or not hazardous substances are used, produced or released in view of deciding on the need to prepare and submit a baseline report. The following substances have been identified for potential use in the operations of the activity:

Table 1.1: Inventory of Material's/Substances to be stored at the proposed facility

MATERIAL/ SUBSTANCE	CAS NUMBER	R-PHRASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION
Diesel	**68334-30-5**	**R10, R20, R38, R45, R48/21, R65, R51/53**	**H226, H304, H315, H332, H350, H373, H411**			
Diesel Oil C9- 20	68334-30-5	R40	H315	**200 Lit**	**Backup Generator Fuel**	**Chemical Store**
Fatty acids, tallow, Me esters	61788-61-2	-	-			
Fatty acids, vegetable oil, Me esters	68990-52-3	-	-			
Naphthalene	91-20-3	R40, R22, R50- 53	H351, H302, H410			
Virkon S (Disinfectant)	-	**R38, R41, R52**	**H272, H302, H314, H317, H318, H334, H315, H319, H412, H335, H401, H411**			
Pentapotassium bis(peroxymonosulphate) bis(sulphate)	70693-62-8	R34, R22, R52	H272, H302, H314, H317, H318, H334	**25 Lit**	**Disinfectant for Cleaning**	**Chemical Store**
Sulphamidic acid	5329-14-6	R36/38, R52/53	H315, H319, H412			

MATERIAL/ SUBSTANCE	CAS NUMBER	R-PHRASE	HAZARD STATEMENT	VOLUME STORED	NATURE OF USE	STORAGE LOCATION
Sodium dodecylbenzenesulfonate	25155-30-0	R22, R36/38	H302, H315, H317, H318, H319, H335, H401, H411			
Dipotassium peroxodisulphate	7727-21-1	R8, R22, R36/37/38, R42/43	H334. H335, H319, H317, H315, H302, H272			

STAGE 2 – IDENTIFICATION OF RELEVANT HAZARDOUS SUBSTANCES

Relevant hazardous substances are those substances or mixtures defined within Article 3 of Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation) which, as a result of their hazardousness, mobility, persistence and biodegradability (as well as other characteristics), are capable of contaminating soil or groundwater and are used, produced and/or stored by the installation.

Table 2.1: Identifying Relevant Hazardous Substances

MATERIAL/ SUBSTANCE	R-PHRASE	HAZARD STATEMENT	RATIONALE FOR INCLUSION / EXCLUSION OF MATERIAL / SUBSTANCE	RELEVANT HAZARDOUS SUBSTANCE
Diesel	**R10, R20, R38, R45, R48/21, R65, R51/53**	**H226, H304, H315, H332, H350, H373, H411**	This substance is considered to constitute a relevant hazardous substance. This product is not classified as toxic to aquatic life with long lasting effects.	✓
Diesel Oil C9- 20	R40	H315		
Fatty acids, tallow, Me esters	-	-		
Fatty acids, vegetable oil, Me esters	-	-		
Naphthalene	R40, R22, R50-53	H351, H302, H410		
Virkon S (Disinfectant)	**R38, R41, R52**	**H272, H302, H314, H317, H318, H334, H315, H319, H412, H335, H401, H411**	This substance is considered to constitute a relevant hazardous substance. This product is not classified as harmful to aquatic organisms.	✓
Pentapotassium bis(peroxymonosulphate) bis(sulphate)	R34, R22, R52	H272, H302, H314, H317, H318, H334		
Sulphamidic acid	R36/38, R52/53	H315, H319, H412		
Sodium dodecylbenzenesulfonate	R22, R36/38	H302, H315, H317, H318, H319, H335, H401, H411		
Dipotassium peroxodisulphate	R8, R22, R36/37/38, R42/43	H334. H335, H319, H317,		

MATERIAL/ SUBSTANCE	R-PHRASE	HAZARD STATEMENT	RATIONALE FOR INCLUSION / EXCLUSION OF MATERIAL / SUBSTANCE	RELEVANT HAZARDOUS SUBSTANCE
		H315, H302, H272		

STAGE 3: ASSESSMENT OF SITE SPECIFIC POLLUTION POSSIBILITY

The European Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on Industrial Emissions" (2014/C 136/03) provides a definition of the phrase **'The possibility of soil and groundwater contamination at the site of the installation'** as follows;

"*(Article 22(2), first subparagraph) covers a number of important elements. Firstly, due consideration should be given in a baseline report to the quantities of hazardous substances concerned – where very small quantities are used, produced or released on the site of the installation then the possibility of contamination is likely to be insignificant for the purpose of producing a baseline report. Secondly, baseline reports must consider the soil and groundwater characteristics of the site and the impact of those characteristics on the possibility of soil and groundwater contamination taking place. Thirdly, for existing installations, their characteristics may be considered where they are such that it is impossible in practice that contamination can take place.*"

A review of Article 3 of Regulation (EC) No 1272/2008 was undertaken and the following substances have been brought forward from Stage 2 having been identified as relevant hazardous substances:

Table 3.1: Environmental Effect of Relevant Hazardous Substances

MATERIAL/ SUBSTANCE	R-PHRASE	HAZARD STATEMENT	VOLUME STORED	CONTROLS IN PLACE
Diesel	**R10, R20, R38, R45, R48/21, R65, R51/53**	**H226, H304, H315, H332, H350, H373, H411**	**500-Lit**	Small volumes stored at any one time. This liquid will be stored in bunded containers. Container is not moved on a frequent basis, as it is stored for emergency use only. Storage area drainage is not connected to the stormwater network.

MATERIAL/ SUBSTANCE	R-PHRASE	HAZARD STATEMENT	VOLUME STORED	CONTROLS IN PLACE
Virkon S (Disinfectant)	**R38, R41, R52**	**H272, H302, H314, H317, H318, H334, H315, H319, H412, H335, H401, H411**	**25-Litres**	Small volumes stored at any one time. Liquid is be stored in bunded containers. Container is not moved on a regular basis, as it is stored for cleaning use only. Storage area drainage is not connected to the stormwater network.

4.0 STORAGE, USAGE, CONTAINMENT MEASURES AND POTENTIAL RISKS OF RELEASE TO THE ENVIRONMENT

As can be seen in Section 3.0 above, the volumes of relevant hazardous substances used on-site are relatively small. Chemical volumes stored on-site are sufficient for short term use, with a replacement supply on-site.

The supply of chemicals to the site is such that only the volumes required for on-going operation and, where applicable, replacement supply, are stored on-site at any one time. There is no bulk storage of relevant hazardous substances at the site.

All relevant hazardous substances will stored in secondary containment or bunded structures. Storage container and corresponding bunds will be stored internally within the chemical store, therefore risk of plastic fatigue or filling with rainwater will be minimal.

The internal drainage of the chemical store is not connected to the stormwater drainage network.

5.0 Conclusion

There is no indication of pollution of soil or groundwater from relevant hazardous substances used at the site, consistent with the current land use and historic land use.

The existing facility is designed to ensure the protection of soil and groundwater. All materials handling is undertaken on appropriately surfaced yards or indoors and therefore, there is a relatively low risk of soil or groundwater pollution arising during normal operations.

The quantity of the relevant substances stored on site at any one time is relatively minor.

The design of the facility combined with good environmental management practices on-site would ensure that the risk of any unplanned events is minimised.

It is apparent, due to the quantities of the relevant hazardous substances used at the installation combined with the measures taken at the facility, that contamination of soil and groundwater would not occur; including containment measures, indoor processing activities and concrete hard standing that the likelihood of, or potential for, contamination of soil or groundwater is extremely low.

It is therefore concluded that additional monitoring to set baseline reference data is not required.