

*Bord na Móna
Energy Ltd.*

**Integrated Pollution Control
Licence Application**

ATTACHMENT No. 13

WASTE MANAGEMENT

*Bord na Móna
Energy Ltd.*

**Integrated Pollution Control
Licence Application**

ATTACHMENT No. 13A

WASTE ARISING

WASTES MANAGEMENT

HAZARDOUS WASTE

- (i) At present waste oils (lubricating oil, hydraulic oil) and brake fluids that are drained from machinery (tractor, truck, locomotive and bulldozer/excavator units) during machine service/repair operations at individual works are collected in drums which are subsequently emptied to a designated waste oil storage tank. An element of this oil is re-used for lubrication of machine parts (chains, switches on railway lines). The remaining waste oil fraction that is unused is transported off-site by a licensed waste disposal contractor (Atlas Oil Ltd).

Oil and fuel filters are changed at much the same service intervals as the lubricating oils at individual workshops. Spent filters are collected at the individual works and are disposed of through a waste disposal contractor i.e. Atlas Oil Ltd.

- (ii) Lead acid batteries are changed whenever the battery unit can no longer hold a sufficient charge. Spent batteries are stored at individual works for collection by Returnbatt.
- (iii) A self-contained machine parts washer (uses a solvent based cleaning agent for cleaning metals, grease, etc., from individual machine parts) located at selected workshops generates off-washings/still bottoms as a waste which is oil/solvent based with a potentially high metal content. This waste is collected within a sludge tank located at individual works. An appropriate licensed waste disposal contractor is currently being sourced to dispose of this waste fraction.
- (iv) Anti-Freeze is either evaporated or drained into an appropriate container if a machine breaks down onto the bog and the coolant system needs to be drained. Otherwise anti-freeze is topped up during every service cycle. An appropriate waste disposal contractor is to be appointed for disposal of any anti-freeze waste generated.

NON-HAZARDOUS WASTE

- (i) Over the years much redundant machinery units and scrap metals (made up of old cut-up machines, crushed barrels, off-cuts from the workshops) have built up and are dispersed throughout the individual works sites. Although a comprehensive clean-up has taken place at individual works (recovery of useful machinery parts and of collection of spent metal/metal off-cuts/metal filings to skip and disposal via Hammond Lane Ltd.) it is apparent that a considerable amount of metal waste remains. Arrangements are under way to remove the remaining redundant machinery/metal waste and dispose of same appropriately.
- (ii) Ash is collected from the boiler used for general building heating purposes for individual works and from the furnace used to dry the sand for the locomotive traction system (located at selected works). Ash is stored in a skip on-site at individual works for collection by Erwin Cobbe Waste Disposal and Sean Mahon Waste Disposal and is disposed of to landfill.
- (iii) Peat silt within surface water run-off from peatland production field catchments is collected within silt settlement/sedimentation pond units. Silt ponds are typically desludged/cleaned out twice per annum. The silt that is extracted from individual silt ponds is spread out on the bog adjacent to the pond unit. A characterisation of the 'leachate' that may be potentially generated from this waste fraction is presented in the attached report (K960-W5: Analysis of Peat silt Generated within a Silt Sedimentation Pond from the Derrygreenagh Group in Compliance with the Requirements of an Integrated Pollution Control Licence Application).
- (iv) Polythene is removed from milled peat stockpiles located on the bog prior to the peat sale. Waste polythene is collected at the roadside for collection and ultimate recycling by Shabra Plastic and Packaging Ltd. Shabra Plastic and Packaging Ltd are presently clearing a backlog of polythene collected at the Bord na Móna bogs.

- (v) Workshop waste, which includes waste generated from milling and lathe machines, welding, cutting and grinding processes, wiping cloths/towels and general packaging waste which includes wooden pallets, oil filter boxes, tins etc., is collected in a skip located on-site at individual works. General domestic waste arising from the office and canteen areas is also disposed of to this skip. The skips are subsequently collected by and by Erwin Cobbe Waste Disposal and Sean Mahon Waste Disposal and disposed of to landfill. Historically, these waste streams were burned or disposed of to waste disposal areas located at individual works.

*ANALYSIS OF PEAT SILT GENERATED WITHIN
A SILT SEDIMENTATION POND FROM THE
DERRYGREENAGH GROUP IN COMPLIANCE
WITH THE REQUIREMENTS OF AN
INTEGRATED POLLUTION CONTROL
LICENCE APPLICATION.*

DRAFT

REPORT NO: K960-W2 (Derrygreenagh Group)

ATTENTION: Mr. Finn Campbell
Bord na Móna Energy Limited
Derrygreenagh Group
c/o Derrygreenagh Works
Rochfordbridge
Mullingar
Co. Westmeath

PREPARED BY: Dr Edward Molyneaux
Environmental Consultant

DATE: 20 May 1999

CONFIDENTIAL

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1.0 INTRODUCTION

During routine cleaning/desludging of the silt sedimentation ponds within the Derrygreenagh Group, the extracted peat silt is disposed of to ground on the bog adjacent to the pond. In compliance with the requirements of their Integrated Pollution Control Licence Application, the Derrygreenagh Group, Bord na Móna Energy Limited, c/o Derrygreenagh Works, Rochfordbridge, Mullingar, Co. Westmeath; assessed the potential pollution content of 'leachate' that may be generated from the peat silt material which may discharge to ground and impact on the underlying groundwater.

Bord na Móna Environmental Limited were commissioned to perform the sampling and analysis. A silt settlement pond within the Derrygreenagh Group was subsequently sampled by a Bord na Móna Environmental Consultant on 22/4/1999. Peat silt samples were returned to the laboratory for subsequent analysis (an appropriate leachability investigation on silt material was carried out).

This report details the silt sampling and leachability testing which took place including the sampling and analytical methods used. In addition, an interpretation of the results obtained is included.

2.0 METHODOLOGY

2.1 Sampling

Peat silt from the DH1 silt sedimentation pond (for location refer to Drawings 11.1a - 11.1e of the Drawings Folder of the IPC Licence application) was collected (grab sample) in accordance with standard procedures, returned to the laboratory, and stored at 4°C.

2.2 Control Chain Of Custody

As part of the Quality System in place in Bord na Móna, Environmental Limited, measures are taken to ensure controlled chain of custody. An outline of the chain of custody is given overleaf.

2.3 Analysis

All peat silt samples returned to the laboratory were stored at 4°C. A leachability test was carried out on a peat silt fraction as per the DIN 38414 test method. Aliquots of the eluate were subsequently taken for analysis (as per Table 2.1 below) in order to determine the major chemical constituents the original silt sample.

TABLE 2.1: CHEMICAL ANALYSIS OF SAMPLES		
Parameter	Limit of Detection/Range	Method
pH	0.1 - 14 pH units	G/05
BOD ₅	2 - 5000 mg l ⁻¹	G/04
COD	10 - 1500 mg l ⁻¹	G/03
Conductivity	0.1 - 1999 µS cm ⁻¹	G/06
Heavy Metals	<2 µg l ⁻¹	ICP-MS based on ASTM D 5673
Major Anions & Cations	<0.1 mg l ⁻¹	IC based on ASTM D 4327
Total Alkalinity (CaCO ₃)	0 - 500 mg l ⁻¹	APHA 2320b

- ASTM - American Society for Testing and Materials, Annual Book of ASTM Standards 1997.
 APHA - American Public Health Association, Standard Methods For the Examination of Waters and Waste Waters, 19th Edition, 1995.
 G/ - ILAB Accredited Method, Bord na Móna Environmental & Analytical Services Standard Operating Procedures Manual

BORD NA MÓNA
BORD NA MÓNA ENVIRONMENTAL LIMITED

CONTROLLED CHAIN OF CUSTODY

SITE

Sampling and packaging of all samples were carried out by Bord na Móna Technical Team:
Dr E Molyneux

TRANSPORT

Transport Document Form

Transport to laboratory by Bord na Móna Technical Team.

Sample Reception Form

LABORATORY

Receiving of samples at Bord na Móna Environmental Laboratory complex by:
Dr. J. Reilly, Laboratory Manager
(Secure laboratory complex access to authorised personnel only)

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Storage of all samples for 1 month period after report issue.

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Supervised Disposal

2.4 Quality Control

The Environmental Limited Laboratory complex have been awarded ILAB accreditation by the ILAB secretariat. A stringent six point quality control approach is at present implemented in the laboratories.

- (i) Controlled chain of custody.
- (ii) Operator competence - all analysts must be suitably qualified to carry out required analysis.
- (iii) Certified Reference Materials (CRM). The accuracy of a series of determinations is checked against known standards.
- (iv) Duplicate - 10% duplication is normal.
- (v) Quality Control Charts.
- (vi) Inter Laboratory Testing - The Environmental Limited Laboratories are members of the WASP Interproficiency Testing Scheme and the W.R.C. Aquacheck Scheme. The Laboratory also participates in the Environmental Protection Agency's Intercalibration Programme and is listed on the Agency's Draft Register of Quality Approved Testing Laboratories for 1998/99.

3.0 RESULTS

The results of the investigations carried out by Bord na Móna Environmental Limited are presented in Tables 3.1 and 3.2 as follows:

Table 3.1: Results of Chemical Analysis of DH1 Silt Sedimentation Pond Peat Silt Eluate Sample

Table 3.2: Results of Heavy Metal Analysis of DH1 Silt Sedimentation Pond Peat Silt Eluate Sample

TABLE 3.1: RESULTS OF CHEMICAL ANALYSIS OF DH1 SILT SEDIMENTATION POND PEAT SILT ELUATE SAMPLE	
Parameter	Concentration
pH (pH units)	8.3
Conductivity ($\mu\text{S cm}^{-1}$)	457
Ammonical-N (mg l^{-1})	<0.2
COD (mg l^{-1})	69
BOD ₅ (mg l^{-1})	<10
Calcium (mg l^{-1})	101.7
Chloride (mg l^{-1})	12.1
Fluoride (mg l^{-1})	0.2
Magnesium (mg l^{-1})	2.1
Nitrate-N (mg l^{-1})	2.5
Orthophosphate (mg l^{-1})	<0.5
Potassium (mg l^{-1})	0.7
Sodium (mg l^{-1})	7.3
Sulphate (mg l^{-1})	19.0
Alkalinity (CaCO_3) (mg l^{-1})	220

TABLE 3.2: RESULTS OF HEAVY METALS ANALYSIS OF DH1 SILT SEDIMENTATION PEAT SILT ELUATE SAMPLE	
Parameter	Concentration
Aluminium ($\mu\text{g l}^{-1}$)	18
Antimony ($\mu\text{g l}^{-1}$)	<2
Arsenic ($\mu\text{g l}^{-1}$)	13
Barium ($\mu\text{g l}^{-1}$)	862
Beryllium ($\mu\text{g l}^{-1}$)	<2
Boron ($\mu\text{g l}^{-1}$)	124
Cadmium ($\mu\text{g l}^{-1}$)	<2
Chromium ($\mu\text{g l}^{-1}$)	<2
Cobalt ($\mu\text{g l}^{-1}$)	2
Copper ($\mu\text{g l}^{-1}$)	7
Iron ($\mu\text{g l}^{-1}$)	<50
Lead ($\mu\text{g l}^{-1}$)	13
Manganese ($\mu\text{g l}^{-1}$)	162
Mercury ($\mu\text{g l}^{-1}$)	<2
Nickel ($\mu\text{g l}^{-1}$)	11
Selenium ($\mu\text{g l}^{-1}$)	<5
Silver ($\mu\text{g l}^{-1}$)	<2
Tin ($\mu\text{g l}^{-1}$)	6
Zinc ($\mu\text{g l}^{-1}$)	270

4.0 DISCUSSION

In order to assess the potential pollution content of 'leachate' that may be generated from the peat silt material withdrawn from silt sedimentation ponds during the routine desludging/cleaning of same, an eluate sample extracted by a leachability test (DIN 38414 test method) on a silt fraction obtained from silt pond DH1 (Derrygreenagh Group - for location refer to Drawings 11.1a - 11.1e of the Drawings Folder of the IPC Licence application) was prepared. Results for the chemical and heavy metal analysis of the peat silt eluate sample are presented in Tables 3.1 and 3.2, respectively. The eluate was found to contain an elevated COD content (69 mg l^{-1}). This may be directly attributable to the presence of poorly biodegradable (as evidenced by the low BOD level) organic (lignin and bitumens - residual fatty acids, unaltered waxes & steroids) and inorganic material associated with peat (decomposed remnants which form peat). Results of nutrient ($\text{NH}_3\text{-N}$, $\text{NO}_3\text{-N}$, $\text{PO}_4\text{-P}$) analysis showed that the levels were generally low. With the exception of Iron and Manganese (metal elements of peat), Barium and Zinc, low levels/trace amounts of metals were detected in the eluate sample. The occurrence of elevated levels of the Barium and Zinc metal components has not been established. The environmental implications of the discharge of a 'leachate' containing such levels are considered to be minimal.

In summary, results indicate that the 'leachate' that may be generated from peat silt, which is disposed of to ground (on the bog) adjacent to individual silt sedimentation ponds, is unlikely to have a significant effect on the soil and groundwater environments into which it may ultimately discharge.

*Bord na Móna
Energy Ltd.*

**Integrated Pollution Control
Licence Application**

ATTACHMENT No. 13B

*WASTE DISPOSAL
ARRANGEMENTS*

PERMIT FOR COLLECTION OF WASTE OILS

(Permit issued under EPA Act, 1992, Waste Management Act, 1996, SI 164 of 1998)

LOCAL AUTHORITY :

LAOIS COUNTY COUNCIL

COLLECTOR BEING PERMITTED :

ATLAS OIL LABORATORIES LTD.

PRINCIPLE PLACE OF BUSINESS :

Clonminam Ind. Estate, Portlaoise.

PERMIT NUMBER:

WO 1

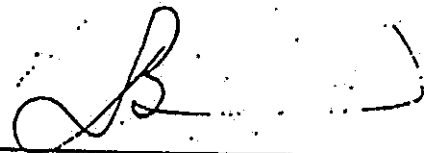
The County Council of Laois in accordance with the regulations listed above and under Section 34(1) of the Waste Management Act hereby grants a permit for the collection of waste oils to Atlas Oil Laboratories Ltd subject to the following conditions:

1. The categories of waste oil's which may be collected are;
 - (a) Spent motor lubricant, oily ship slops and waste fuel oils.
 - (b) Oily wastes and oil sludges from oil tank bottoms and oily wastes from oil interceptors/separators.
 - (c) Other oily wastes and oil mixtures including those arising from the use of machine oil, cylinder oil, turbine oil, gear spindle oil, cutting and drawing oil and quench oils.
2. Disposal of waste oils shall be by way of reprocessing and/or regeneration at a licensed waste oil recovery facility defined under Section 8.
3. The collector must use suitable collection vehicles which meet the oil industry standard
4. Pending onward transfer of the waste oils to a licensed waste oil recovery facility it will be stored at a depot. This depot will have the necessary planning permissions and permits.
5. All loading, unloading, and storage of waste oils shall take place within designated areas of the depot which shall be adequately bunded to ensure that any spillage's that occur are contained and returned for reprocessing.

- 6) The crushing machine shall only be operated between the hours of 8 a.m. - 6 p.m., Monday - Saturday.
- 7) The following records shall be maintained on site:-
 - a) Daily record of materials received on site outlining type, quantity and origin.
 - b) Record of crushing process detailing time and date of operation of crusher, oil recovered and metal bales released to storage.
 - c) Record of all movements of baled metals off site to a licenced scrap metal processor indicating dates, weights and destination.
- 3) A copy of the records required under Condition 7, of this permit shall be submitted to Laois County Council on a three monthly basis or as requested.
- 9) A charge of £200 is payable per annum.
- 10) This permit, subject to compliance with all conditions is valid for a period of one year commencing 1st October, 1998.

It will then be reviewed at the end of this period or at any other time, if required by Laois County Council.

Dated this 5 day of October 1998.



County Secretary

ORDER NO: 258

THE EUROPEAN COMMUNITIES [WASTE] REGULATIONS 1979.

THE WASTE MANAGEMENT ACT 1996

PERMIT FOR THE COLLECTION, PROCESSING AND DISPOSAL OF USED FILTERS.

LOCAL AUTHORITY: LAOIS COUNTY COUNCIL. REGISTER NO: 22

**TO: ATLAS OIL LABORATORIES,
CLONMINAM INDUSTRIAL ESTATE,
PORTLAOISE.**

7 October, 1998.

The County Council of Laois in exercise of the powers conferred on it by Article 5 of the European Communities (Waste) Regulations 1979 and by the Waste Management Act 1996, renew the permit granted to Atlas Oil Laboratories, to collect, process and dispose of used filters subject to the following conditions:

- 1) This permit relates to the collection, processing (by recovery of oils and metals) and disposal of used filters only.
- 2) The maximum quantity of used filters arriving on site shall not exceed 250 tonnes per year.
- 3) All containers used for the collection of filters (i.e. drums and skips) and all tanks/sumps at the intake and under the crusher at the Atlas garage facility in Clonminam, shall be sealed and well contained so that no escape of waste oil can occur.
- 4) Adequate precautions shall be taken to ensure that any accidental spillage of waste oil, either in transit of filters or on site, shall be dealt with by Atlas Oil Ltd. in a prompt and efficient manner.
- 5) Operation of the crusher shall not give rise to excessive noise levels in the area.

6. Waste oils shall be collected, handled, transported and stored in a manner so as to minimise the risks of contamination to all environmental media or endangerment to the general public and their health. All accidental spillages or discharges of waste oils which occur during the collection, transportation or storage shall be notified to the Local Authority in whose functional area the spillage or discharge has occurred and the Permit Local Authority in accordance with the Local Government (Water Pollution) Act 1977 and the Local Government (Water Pollution) (Amendment) Act, 1990. The collector shall comply with the requirements of a Local Authority in relation to such accidents.
7. Collector will maintain full records of where waste oil's were collected and the licensed waste oil recovery facilities to whom the waste oil's were subsequently transferred to.

When collecting waste oil from producers, the collector will issue an individually numbered collection docket which will give the following details;

- (a) Gross volume of waste oil collected
- (b) Date of collection
- (c) Name and address of company/person oil collected from
- (d) Signature of producer of waste oil confirming the accuracy of the details on the collection docket.

Every three months the collector must furnish to the Local Authority the following information;

- (a) Details of all volumes of waste oil collected from individual producers in the last three months
- (b) Details of all volumes of waste oil transferred to licensed waste oil recovery facilities.
- (c) Copies of stock records confirming that all waste oils collected have been accounted for.
- (d) Details of all vehicles used to collect the waste oils

Copies of all records must be maintained for two years at the principle place of business of the collector.

8. All waste oils collected shall be transferred for processing and/or regeneration to either:
 - (a) Within the State a facility licensed under Part IV of the EPA Act. The proximity principle will apply and waste should be directed to a facility reasonably close to the source of the waste oil.

Or

- (b) Exported to a licensed recovery facility outside the State in accordance with Waste Management (Transfrontier Shipment of Waste) Regulations 1998.

Before a certificate of dispatch under the Transfrontier Shipment of Waste Regulations 1998 shall be issued by the Permit Local Authority for waste oil to be exported the following conditions must be met;

- I. Prior to dispatch shipment of oil must be isolated in a designated tank at the above specified depot and sample tested by an independent laboratory to confirm that the waste oils meet the enclosed specifications for waste oil.
 - II. All other conditions of the Waste Management (Transfrontier Shipment of Waste) Regulations 1998 must be met.
9. All oily waters collected with the waste oil must be transferred with the waste oil to the licensed waste oil recovery facility.
 10. Each consignment of waste oil from a non lubricant or non ship source will be sampled and tested prior to collection to ensure it does not contain Polychlorinated Biphenyl (PCB's). Positive results of this analysis, including details of date collected, volume and source of the waste oil shall be forwarded immediately to the Permit Local Authority and the Local Authority in whose functional area the waste oils were collected. This waste oil shall not be stored with other waste oil's or disposed of without the permission of the Permit Local Authority.
 11. The collector shall pay the Permit Local Authority £580 in respect of this permit.
 12. The permit is valid for a 12 month period from the date of issue.

Signed:

Secretary


A. J. County Secretary

Date

26th January 1999

Comhairle
Chondae
Chill Dara
Naomh Mhuire
An Nás



Kildare
County
Council
St. Mary's
Naas

Your Ref:

Date

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E-Mail: secretar@kildarecoco.ie

This matter is being dealt with by:

J Donovan (W.1/98)

**The European Communities (Waste) Regulations 1979
The European Communities (Toxic and Dangerous Waste) Regulations 1982**

**Permit for treatment of used lead acid batteries and storage of
nickel cadmium batteries, nickel metal hydride batteries
and batteries containing mercury, lithium, magnesium, chromium and silver**

Mr Michael O'Donnell
Returnbatt Ltd
Unit 35
Kildare Enterprise Centre
Melitta Road
Kildare

The Kildare County Council, in exercise of the powers conferred on it by Article 5 of the European Communities (Waste) Regulations 1979 and the European Communities (Toxic and Dangerous Waste) Regulations 1982 hereby grants a permit to Returnbatt Ltd, Unit 35, Kildare Enterprise Centre, Melitta Road, Kildare to collect, transport and store nickel cadmium batteries, nickel metal hydride batteries and batteries containing mercury, lithium, magnesium, chromium and silver and to collect, transport, store and treat used lead acid batteries and dispose of same in accordance with particulars furnished with application dated 28 November 1997, subject to the following conditions, viz:

- (1) This permit allows for the collection, transport and storage of nickel cadmium batteries, nickel metal hydride batteries and batteries containing mercury, lithium, magnesium, chromium and silver and the collection, transport, storage and treatment of used lead acid batteries and disposal of waste. In this permit the treatment of lead acid batteries constitutes shredding of the waste batteries, draining and collecting the acid from the batteries and baling the remaining lead and plastic.

Comhairle
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Kildare
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Date

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This matter is being dealt with by:

J Donovan (W.1/98)

- 2 -

- (2) The lead acid, nickel cadmium, nickel metal hydride batteries and batteries containing mercury, lithium, magnesium, chromium and silver shall be collected and transported in vehicles designed for the safe handling of such waste and operated in a fashion which will not endanger human health or harm the environment. The batteries shall be contained in acid-resistant or alkali-resistant high density polyethylene containers during transport.
- (3) Collection vehicles shall have, and display:
 - (i) A current certificate of road worthiness issued in accordance with the European Communities (Vehicle Testing) Regulations 1981, in respect of each vehicle being used for the collection and transportation of the waste.
 - (ii) Current motor insurance in respect of each vehicle being used for the collection and transportation of the waste.
 - (iii) Current licence disc in respect of each vehicle being used for the collection and transportation of the waste.
- (4) The used batteries shall be stored in acid-resistant or alkali-resistant high density polyethylene containers in a designated and secure storage area at Unit 35, Kildare Enterprise Centre, Melitta Road, Kildare. The nickel cadmium, nickel metal hydride batteries and batteries containing mercury, lithium, magnesium, chromium and silver and lead acid batteries shall be stored separately. All loading and unloading of batteries from the polyethylene containers shall be carried out within the building, which shall be bunded to prevent contamination of ground and surface waters. A ramp shall be provided at the entrance to contain any spillage.
- (5) The crushing and baling operations shall be carried out in such a manner that all acid is collected in an acid resistant tray located beneath the machine. This waste effluent shall be pumped to bunded acid resistant storage tanks via a pipe with a secondary containment system to intercept any spillage. Lead acid batteries only shall be crushed and baled.

Beidh fáilte roimh gnó tré Ghaeilge

Comhairle
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This matter is being dealt with by:

J Donovan (W.1/98)

- 3 -

- (6) All effluent contaminated with sulphuric acid shall be stored in containers in a separate bunded area (within the bunded building) with an impermeable acid-resistant base and walls. This effluent shall be disposed of in accordance with the EC (Toxic and Dangerous Waste) Regulations, 1982. The Company shall notify Kildare County Council immediately, in writing, of any difficulties encountered or anticipated with respect to the disposal of the waste. Each storage tank shall be vented to the atmosphere via a vent pipe.
- (7) Waste from the lead-acid batteries, other than the solid waste baled and exported or the liquid waste transported for treatment under C1 documentation, shall be considered hazardous waste and disposed of in accordance with the EC (Toxic and Dangerous Waste) Regulations 1982.
- (8) The maximum 8-hour time weighted average concentration of lead in the air in the process area shall not exceed 0.15mg/m³ and shall be in accordance with the requirements of the Health and Safety Authority. The level of dust shall be controlled by the addition of moisture, however care shall be taken to prevent the formation of dust deposits if wetted surfaces dry out. Monitoring of levels of lead in the process area shall be carried out at three monthly intervals and these results shall be submitted to Kildare County Council.
- (9) Ambient air monitoring shall be carried out at a location in the forecourt of the unit to be agreed on-site. The concentration of lead in the air shall not exceed 2ug/m³. Monitoring shall be carried out on the levels of lead in the air at three monthly intervals and these results shall be submitted to Kildare County Council. If the level of lead in the process area or outside the building exceeds the required parameters then alterations to the process will have to be carried out to comply with these provisions. The level of monitoring will be reviewed after six months.

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This matter is being dealt with by:

J Donovan (W.1/98)

- (10) The noise level shall not exceed 55 dB(A) Leq along the boundary of the development between 8.00 am and 6.00 pm Monday to Friday inclusive, but excluding bank holidays. At all other times, including bank holidays the noise level from the development shall not exceed 35 dB(A) Leq at any point along the development boundary. The permit holder shall comply with the European Communities (Protection of Workers) (Exposure to Noise) Regulations 1990.
- (11) The Company shall maintain a register showing the quantity and source of lead-acid batteries collected. A copy of this register shall be submitted to Kildare County Council at monthly intervals.
- (12) No trade effluent shall be discharged to the surface water or foul sewer from the premises.
- (13) All non-hazardous solid wastes shall be disposed of in accordance with the European Communities (Waste) Regulations 1979 and the Waste Management Act 1996.
- (14) The permit holder shall produce to the Council current insurances under the following headings:
 - (a) Public Liability to a minimum cover of £1,000,000 for any one claim.
 - (b) Employer's Liability- unlimited

These policies shall include a clause indemnifying the Council against any claims arising. In the event of any such policy expiring during the currency of the permit, it shall be renewed with effect from the date of expiry and evidence of such renewal shall be produced to the Council.

- (15) All hazardous waste shall be transported in accordance with the EC (Toxic and Dangerous Waste) Regulations 1982 and the EC (Transfrontier Shipment of Waste) Regulations 1994. All batteries shall be exported in accordance with the EC (Transfrontier Shipment of Waste) Regulations 1994.

Beidh fáilte roimh gnó tré Ghaeilge

Comhairle
Chondae
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Naomh Mhuire
An Nás



Kildare
County
Council
St. Mary's
Naas

Your Ref:

Date

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This matter is being dealt with by:

J Donovan (W.1/98)

- (16) The Council reserves the right to cancel this permit, should there be material non-compliance with the terms of the permit hereof.
- (17) The permit is valid from the date hereunder to 31 December 1998. An application to have the permit renewed, alterations made to the permit or have the permit reviewed shall be made at least one month prior to the cessation date of the permit.

Date of commencement of permit:

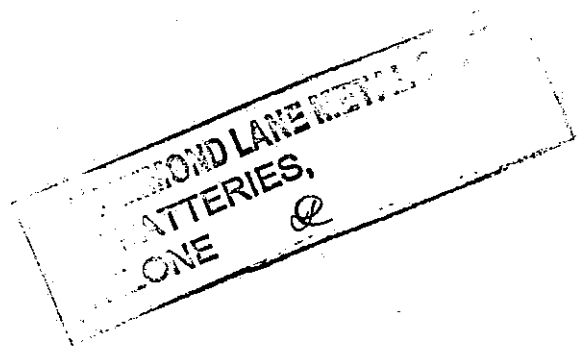
Signed: 
County Secretary

Date: 22nd May 1998

WESTMEATH COUNTY COUNCIL

European Communities (Waste) Regulations 1979

**Permit to treat and store waste at The ~~Hammond~~ Lane Metal Co.,
The Batteries, Athlone, Co. Westmeath.**



The Council of the County of Westmeath (hereinafter referred to as "the Council") in accordance with the above Regulations hereby grants a permit to Hammond Lane Metal Co., The Batteries, Athlone, Co. Westmeath (hereinafter referred to as "the Licensee") for the period of thirty six months commencing on the date of signing of this permit subject to the conditions contained overleaf.

WESTMEATH COUNTY COUNCIL

Waste Regulations 1979

Permit to store waste at premises at The Batteries, Athlone, Co. Westmeath, in accordance with conditions set out hereunder and as authorised by County Manager's Order No. 39-97 dated 27th June 1997.

Conditions of Permit

1. General

- 1.1 This permit shall be in respect of scrap metal recycling operations at The Hammond Lane Metal Co., The Batteries, Athlone, and associated transports only.
- 1.2 The duration of this permit shall be for a period of 36 months from the date of issue, and any extensions beyond that date shall be subject to review by Westmeath County Council, having regard to the manner in which the site has been operated and maintained in the intervening period.
- 1.3 The permit holder, his servants or agents, shall refrain from carrying on any scrap metal recovery operations on any lands within the functional area of Westmeath County Council, other than the lands at the Batteries, Athlone, to which this permit refers, unless and until a permit has been issued to him, and unless and until planning permission (if appropriate) therefor shall have been granted to him for the carrying on of any scrap metal recovery operations on any such lands.
- 1.4 Nothing contained in or omitted from this permit shall relieve the Permit Holder of his duty to comply with any provisions of the European Communities (Waste) Regulations, 1979 (S.I. No. 390 of 1979) or of the Waste Management Act, 1996.
- 1.5 In the event of any breach of the conditions attached to this permit, the permit holder shall on receipt of Notice from Westmeath County Council, cease operations within the time specified in the Notice and the permit shall be suspended from the date specified in the Notice until such suspension is lifted on rectification of the breach of condition(s) specified in the Notice.
- 1.6 This permit is non-transferable.
- 1.7 The permit holder shall notify Westmeath County Council of any proposed changes in the operations at the facility which would cause, or be likely to cause a material change in operations at the facility. Westmeath County

Council shall interpret whether such change is material or not, and whether a review of the permit is required as a result.

- 1.8 Authorised Officers of Westmeath County Council, or it's Agents, shall have access to the permit holder's premises at all reasonable times, including, if necessary, times other than normal working hours, for the purpose of their functions under the European Communities (Waste) Regulations, 1979.

2. Nature of Waste

- 2.1 The permit holder shall refrain from collecting, transporting or otherwise handling any waste of a toxic or dangerous nature as defined by the European Communities (Toxic & Dangerous Waste) Regulations, 1982 (S.I. No. 33 of 1982).

3. Register of Operations

- 3.1 The permit holder shall maintain a Register of Operations involving the handling of scrap showing the type and quantities of material, it's origin and place of final disposal.
- 3.2 The Register shall be made available for inspection at all reasonable times, by any Authorised Officer of Westmeath County Council, or it's Agents, and the permit holder shall provide relevant information when so requested by such Authorised Officer or Agents.

4. Site Operations

- 4.1 No scrap cable shall be burned within the administrative area of Westmeath County Council and there shall be no emissions to atmosphere as a result of any treatment process employed by the holder of this permit to extract metals from scrap cable.
- 4.2 All waste oils arising from the operation of the site shall be collected and stored pending re-use or removal off-site by Specialist Contractor for disposal or recovery in accordance with the European Communities (Waste Oil) Regulations, 1992 (S.I. No. 399 of 1992). A separate Register shall be maintained in relation to oil disposal showing the quantity and date of disposal, and by whom the oil was disposed.
- 4.3 Oil traps/interceptors shall be maintained (inspected and cleaned) at such intervals as to ensure their optimal performance.
- 4.4 All scrap metal shall be collected, transported, handled and stored in such a manner as to reduce as far as is practicable all risks of contamination of waters or soil.
- 4.5 Open burning of wastes on the site shall be prohibited.

- 4.6 All non-reusable, non-recyclable, non-toxic waste shall be disposed of to a waste disposal facility operated or licensed by a Local Authority and in accordance with the provisions of the European Communities (Waste) Regulations, 1979 and the Waste Management Act, 1996.

5. **Contributions to Westmeath County Council**

- 5.1 The permit holder shall pay to Westmeath County Council a minimum annual contribution of £187, or such greater as Westmeath County Council from time to time determines, towards the cost of monitoring this permit. The permit holder shall in 1998 and subsequent years, not later than February 28th of each year, pay to Westmeath County Council this amount updated in accordance with changes in Table 5 of the All Items Index (base at November 1975 = 100), published by the Central Statistics Office, from the date of this permit to the 31st December of the year immediately preceding payment. The updated amount shall be notified to the permit holder by Westmeath County Council. For 1997, the permit holder shall pay a pro-rata amount from the date of this permit to December 31st next. This amount shall be paid to Westmeath County Council within 2 months of the date of issue of this permit.

Dated this 30th day of June, 1997.

Signed:


County Secretary.

THE EUROPEAN COMMUNITIES (WASTE) REGULATIONS, 1979

PERMIT TO TREAT, TIP AND/OR STORE WASTE

Register No.1/95

Local Authority : Monaghan County Council

To/ Shabra Recycling,
Killycard Industrial Estate,
Bree,
Castleblayney.

Monaghan County Council in exercise of the powers conferred on them by Article 5 of the European Communities (Waste) Regulations, 1979 hereby grants a permit to store waste in accordance with the plans and particulars furnished with application number 1/95 dated 10 September, 1995 subject to the following conditions.

AS PER ATTACHED SCHEDULE

Dated this 13 day of May 1996



Monaghan County Manager

Order No. S 22/96.

PERMIT TO TREAT AND STORE WASTE.
Schedule of Conditions.

1. The site shall only be used for:-
 - a. The collection, baling and storage of cardboard and paper.
 - b. The collection, storage and recycling of plastics.
 2.
 - a. Only empty clean cardboard and plastic materials shall be accepted and be handled on site.
 - b. "Dry" processes only shall be carried out on site. X
 3.
 - a. The waste storage area shall be confined to the existing building on site.
 - b. The site shall be maintained in a clean and tidy state and shall be kept free from litter and/or accumulated occasional wastes.
 4. Records of the following shall be maintained on site and made available to Monaghan County Council monthly or on request.
 1. The types and quantities of all waste handled.
 2. The origin of waste.
 3. The destination of the waste/by products and recycled material.
 5.
 - a. Register of chemicals, dyes and solvents shall be maintained on site along with their Health and Safety Data sheets. This information shall be made available to Monaghan Co. Council on request.
 6. Drums of chemicals, dyes, oils and solvents shall be stored in designated and secure storage areas. Storage areas shall be bunded or otherwise designed, so that surface and ground water cannot be contaminated by any spillages.
 7. No change in plastic recycling process shall take place without prior approval, *IN WRITING*, by Monaghan County Council.
 8. Spent solvents and/or redundant dyes shall be re-used on site unless other arrangements for disposal are agreed, *IN WRITING*, with Monaghan County Council.
 9. Monaghan County Council may review this permit every three years, or on application for a review by the permit holder.
- b



97/264

TO: Shabra Plastics & Packaging Ltd.
Finegan Jackson & Associates
The Stables
Drumconrath Road
Carrickmacross

RECEIVED : 3 AUG 1997

Re/ Local Government (Planning and Development) Act 1963 to 1993.
NOTIFICATION OF GRANT

Monaghan County Council has by order dated 02/07/1997 granted Permission to the above named, for the development of land namely:- erect extension to factory premises and water treatment plant at Killycard Ind. Estate, Castleblayney, Co. Monaghan subject to the 8 condition(s) set out in the Schedule attached.

Signed on behalf of MONAGHAN COUNTY COUNCIL.

A. M. Chaney
ADMINISTRATIVE OFFICER

11.8.1997
DATE

xIt should be noted that an outline permission is a permission subject to the subsequent approval of the Planning Authority and that until such approval has been obtained to detailed plans of the development proposed, the development is NOT AUTHORISED.

NOTE:

The permission herein granted shall, on the expiration of the period of 5 years beginning on the date of the granting of permission, cease to have effect as regards:-

- (1) In case the development to which the permission relates is not commenced during the period, the entire development and
- (2) In case such development is so commenced, so much thereof as is not completed within that period.

Comhairle Chontae Mhuineacháin

COMHÁIRLE CHONTAE,

THE GLENN,

MUINEACHÁN.

Guthán : 047 - 82211

*Seoladh comhfhreagrais go dtí
an Rinnáil.*



Monaghan County Council

COUNTY OFFICES,

THE GLEN,

MONAGHAN.

Telephone : 047 - 82211

Fax : 047 - 82739

*All correspondence should be addressed
to the Secretary.*

13 March, 1997

Mr. Oliver Brady,
Shabra Ltd.,
Carrickmacross,
Co. Monaghan.

Re: Recycling of Plastic Waste.

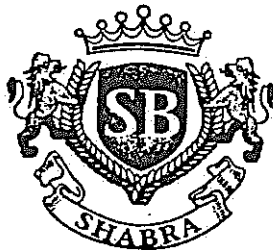
A Chara,

Further to our discussion in connection with expanding your processing of waste plastic I wish to confirm that there will be no difficulty in securing planning permission or the necessary licences for your property in Castleblayney in connection with your expansion.

As your existing operation in Castleblayney is on an industrial estate and the existing buildings were constructed by the IDA as advanced factories the location is ideal as you have the necessary space outside to construct additional accommodation if required. As you are aware the waste regulations are not in force yet but immediately they become operable we can process an application for you to store and recycle waste plastic and I see no reason why your application will not be successful.

Mise le meas,

J. O. Gavin,
County Manager.



041-9831597

SHABRA PLASTICS & PACKAGING LIMITED

Ardee Road, Carrickmacross, Co. Monaghan.
Tel: 042-63002/63150. Fax: 042-62099

Maire Deighan
Monaghan County Council
County Offices
Courthouse
Monaghan

Date: 25th March 1999

Dear Marie

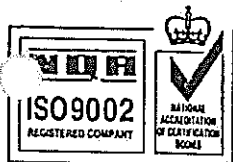
Further to our telephone conversation, please find enclosed a copy of my permit for *Killycard Industrial Estate*. I am also enclosing a letter which I received from The EPA and it appears my permit needs to be reviewed and updated under *Waste Management Regulations SI No. 162 of 1998*.

I would be much obliged if you could carry out this update on my permit in order for it to comply with the regulations as stated in the ERA letter.

Yours sincerely

PP. J. Brady

Oliver Brady
Managing Director



ISO 9002

Certificate No. 5842

Directors: Rita Shah, Oliver Brady. Registered No. B9443. VAT No. Y4606863V.

BERNIE O'FLAHERTY

Rosie

An Ghníomhaireacht um Chaomhnú Comhshaoil



Mr. Oliver Brady
Managing Director
Shabra Plastics & Packaging Ltd
Ardee Road
Carrickmacross
Co. Monaghan

MARIE Deery

PO Box 3000
Johnstown Castle Estate
County Wexford
Ireland

Tel.: +353 53 60600
Fax: +353 53 60699
Website: www.epa.ie

Date

Our ref.

Your ref.

24 March, 1999

04/16/02/02

re: Waste Management Licensing

Dear Mr. Brady,

I am to refer to your letter of 9 September, 1998 in respect of a waste activity carried on at Killycard Industrial Estate, Castleblaney, Co. Monaghan. The Agency has reviewed the information about the activity which you submitted to it, in light of new Waste Management Regulations operative since 20 May 1998.

The activity is prescribed for licensing by the Agency under the Waste Management (Licensing)(Amendment) Regulations, S.I. No. 162 of 1998. However, the Waste Management (Permit) Regulations, S.I. No. 165 of 1998 provide that the requirement for a waste licence shall not apply to certain activities, if and for so long as the person carrying on the activity complies with certain conditions set out in the Regulations. The activity in question appears to be one which comes within the scope of the Waste Management (Permit) Regulations. That being the case, you are advised to apply for a waste permit for the proposed activity to the relevant local authority.

Please note the importance of 1 October 1998, as the date before which a permit application must be made to allow an existing activity to be carried on after that date. See Attachments 1,2 & 3 in relation to waste activities licensable by the Agency and Attachment 4 in relation to those activities which may be subject to a local authority waste permit.

Yours sincerely,

Dolores Buckley

Dolores Buckley
Programme Officer
Waste Management Licensing



RECEIPT OF APPLICATION DOCUMENTATION

Date 5/3/99

Our ref. 96-1

Your ref.

This is a courtesy acknowledgement of receipt of documentation in respect of a waste licence application. It is not intended and should not be construed as an acknowledgement by the EPA of a Waste Licence Application which complies with the Waste Management (Licensing) Regulations. The EPA will examine the documentation for compliance with the regulations and will write to the applicant in this regard in due course.

Waste Licence Application Documentation delivered on behalf of:

Applicant Name & Address: Erwin Garhe Waste Disposal
Ballymore, Kildriddle, Booterstown, Co. Dublin

Facility/Premises Name & Location: Erwin Garhe Disposal, Deer
Lark Goss, Ballymore, Booterstown, Co. Dublin

Fee Amount Submitted: £5,000 cheque no. 004346-90-1861-3012

This is to confirm that, waste licence application documentation, in respect of the above named waste facility, was received by the EPA on:

11/30
Date & Time

[Signature]

Signed on behalf of the EPA

SRIDelRc.dot/Template/AdminTemp



This is a courtesy
acknowledgement of receipt of
documentation in respect of a
waste licence application.

It is not intended and should not be construed as an acknowledgement by the EPA of a Waste Licence Application which complies with the Waste Management (Licensing) Regulations. The EPA will examine the documentation for compliance with the regulations and will write to the applicant in this regard in due course.

THE EUROPEAN COMMUNITIES (WASTE) REGULATIONS, 1979

PERMIT TO COLLECT, TRANSPORT AND TIP WASTE.

LOCAL AUTHORITY : Meath County Council

Reg. No. 8/96.

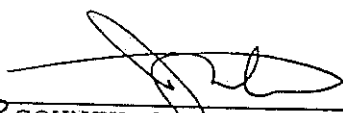
Sean Mahon,
Clonmahon,
Summerhill,
Co. Meath.

The Meath County Council in exercise of the powers conferred on it by Article 5 of the European Communities (Waste) Regulations, 1979, hereby grants a permit to collect, transport and tip waste, subject to the following conditions:-

- (1) The waste shall be collected and transported in vehicles designed for the safe handling of such waste and operated in a fashion which will not endanger human health or harm the environment. Where skips are being used for collecting waste they shall not be parked on the public highway.
- (2) Collection vehicles shall have, and display:-
 - (i) A current certificate of road worthiness issued in accordance with the European Communities (Vehicle Testing) Regulations, 1981, in respect of each vehicle being used for the collecting, transporting and tipping of waste.
 - (ii) Current motor insurance in respect of each vehicle being used in the collecting, transporting and tipping of waste.
- (3) This permit applies only to solid non-toxic waste from domestic, commercial or industrial premises in County Meath. It does not apply to wastes which come within the scope of the European Communities (Toxic and Dangerous Waste) Regulations, 1982, or any of the following wastes:-
 - (a) Animal carcasses or other animal wastes.
 - (b) Agricultural wastes.
 - (c) Explosives.
 - (d) Hospital wastes.
 - (e) Mining waste.
 - (f) Liquid waste.

- (4) All waste collected shall be disposed of in a Local Authority waste disposal facility or in a privately owned waste disposal facility operated in accordance with a current permit issued under the European Communities (Waste) Regulations, 1979, and for which a valid Planning Permission exists.
- (5) The permit holder shall, prior to commencement of any collection service, produce to the Council current insurances under the following headings:-
- (a) Public Liability to a minimum cover of £1,000,000 for any one claim.
 - (b) Employer's Liability - unlimited.
- These policies shall include a clause indemnifying the Council against any claims arising as a result of such services. In the event of any such policy expiring during the currency of the permit, it shall be renewed with effect from the date of expiry and evidence of such renewal shall be produced to the Council.
- (6) The permit holder shall maintain a register of operations in accordance with Article 6 of the European Communities (Waste) Regulations, 1979.
- (7) The permit holder shall, on request by the Council, provide information on the origin, destination, type and quantity of waste being collected, transported and tipped.
- (8) The permit holder shall not dump waste collected outside County Meath, without the prior approval of Meath County Council.
- (9) The permit holder shall submit a drawing to Meath County Council, within two weeks of the date of this permit, showing all details of roads and the number of houses on the roads from which waste collection is made. Information on the number of wheel-bins collected shall also be submitted.
- (10) The Council reserve the right to cancel this permit should there be material non-compliance with the terms of the permit hereof.

SIGNED:


COUNTY SECRETARY.

DATE:

22/7

1996.

*Bord na Móna
Energy Ltd.*

**Integrated Pollution Control
Licence Application**

ATTACHMENT NO. 13C

*WASTE DISPOSAL BY ON SITE
LANDFILLING*

Historical practice was to burn or dispose of general domestic waste (cardboard, paper, plastic, timber pallets, ash from boiler, canteen waste, general office waste) and elements of workshop waste at a designated waste disposal area at the rear of the individual workshop compounds. This waste material was subsequently covered over with topsoil which was in turn levelled out and compacted using a bulldozer/excavator. This practice ceased in 1998/99 with all such waste awaiting deposition collected in a skip at individual works prior to ultimate disposal by a licensed waste disposal contractor to an off-site landfill.