

ANNUAL ENVIRONMENTAL REPORT

for

**The Hammond Lane Metal Co. Ltd
Ringsend , Dublin 4
Year 2018**

**Site licence – P1002- 01
Grid ref: 314838 E/ 234296 N**

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Appendix 1 – PRTR 2018

1. INTRODUCTION

The main site operations are ferrous metal recycling, non-ferrous metal recycling and end-of-life vehicle de-pollution.

Ferrous metal recycling uses two processes:

(1) Fragmentation is the process whereby metals derived principally from the depollution of vehicles (often involving crushing for presentation at recycling facilities) pass through a fragmentation shredding mill which reduces the material to an essentially homogeneous mixture of metal particles and the other materials such as plastics and rubbers making up the constituents of the raw scrap. Other ferrous metal scrap of light structure capable of passing through the fragmentation will form a small percentage of the material treated in this way.

(2) Metal shearing is the second process used in the preparation of ferrous metal for onward disposal. This process is reserved for ferrous metal presented in larger sizes and heavier sections. These are processed through a metal shears which effectively chops the product into manageable sizes for stockpiling, loading and transport.

Ferrous metal fragmentation is carried out at the site and shipped to Belfast for further fragmentising. Material deriving from the shearing process does not contain any nonmetallic component and is suitable for direct shipping to steel smelting mills. Currently this product is shipped direct to Spain as feedstock for the steel industry.

1.1 Facility Details

Licence Registration Number: -	P1002-01
Name: -	Hammond Lane Metal Co. Ltd
Location: -	Pigeon house Road Ringsend Dublin 4
Reporting Period: -	2nd January 2018-22 December 2018

1.2 Licenced Waste Activities

Class Description

11.1 The recovery or disposal of waste in a facility, within the meaning of the Act of 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required.

11.4(b)(iv) Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply): treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.

1.3 Waste Processing at the Facility

Section 21A of the Waste Management Act of 1996, as amended, applies the following priority order in waste prevention and management legislation and policy:

- (a) prevention;
- (b) preparing for re-use;
- (c) recycling;
- (d) other recovery (including energy recovery); and
- (e) disposal.

Hammond Lane Metal Company does not put metals on the market and cannot prevent metal waste arising. Metal wastes received at the facility are unsuitable for re-use, so these materials are prepared for recycling, which is the next highest level in the waste hierarchy.

End-of-life vehicles are accepted for destruction and are unsuitable for re-use by the time they arrive at the Hammond Lane facility. The materials extracted in the de-pollution process are all sent for recovery and where possible, recycling, in compliance with the requirements of the waste hierarchy.

In order to facilitate the recycling and/or recovery of fluids (oils, solvents, etc.) collected from the end-of-life vehicles, separate tanks are provided for each liquid type. These are then collected separately by appropriate waste recovery companies, this facilitating the highest possible level of treatment in the context of the waste hierarchy.

Waste recycling and recovery

Recovery and Recycling of Metals

Hammond Lane's recycling business provides essential services in Ferrous Metal Recycling, Non-Ferrous Metal Recycling and End-of-Life Vehicle De-pollution. Up to 80% of all the metals which pass from their original function into the category of scrap at the end of their primary use go through recycling to be used again in the production of new materials. There is an absolute and indispensable need for a healthy metal recycling industry and HLMC is the leading provider of this service in Ireland.

End of Life De-Pollution of Vehicles

EU Directive 2000/53/EC became effective in January 2006 and directs that end of life cars and commercial vehicles must be dispatched to Authorised Treatment Facilities and a Certificate of Destruction must be issued for each vehicle. This procedure is in place in Ireland but it is reported that as late as 2008, 89% of all ELV's in Ireland were being illegally disposed of.

The 2012 National Waste Report published by the EPA in August 2014 confirms that Ireland is achieving the 2006 targets of 80% recycling and 85% recovery of ELVs, set in Directive 2000/53/EC. However, the report states that Ireland is at risk of not achieving the January 2015 targets of 85% recycling and 95% recovery.

Hammond Lane's ELV de-pollution and recycling activities at the Ringsend site are crucial to Ireland's efforts to achieve the ELV recycling and recovery targets.

1.4 EMISSIONS FROM THE INSTALLATION

EMISSION	MONITORING FREQUENCY
STORMWATER	Tankered offsite.
GROUNDWATER	QUATERLY
DUST	QUATERLY
SOIL	EVERY THREE YEARS
NOISE	ANNUAL

Note: monitoring is ongoing and exceedances are reported to the EPA via the Eden system.

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2. Waste management records

2.1 Waste accepted 2018

EWC Code	Waste Type	r code	quantity tonne	
02 01 10	Waste Metal	r4 all		
11 05 01	Hard Zinc	r4 all		
11 05 02	Zinc Ash	r4 all		
12 01 01	Ferrous Metal Filings & Turnings	r4 all		
12 01 03	Non-Ferrous Metal Filings & Turnings	r4 all		
12 01 21	Spent Grinding Bodies	r4 all		
12 01 99	Waste not otherwise specified	r4 all		
15 01 04	Metallic Packaging	r4 all		
15 01 05	Composite Packaging	r4 all		
16 01 04*	End-of-Life Vehicles	r4 all	407	
16 01 06	End-of-Life Vehicles (De-polluted)	r4 all	17923.58	
16 01 17	Ferrous Metal	r4 all		
16 01 18	Non-ferrous Metal	r4 all		
16 02 14	Discarded Equipment	r4 all		
16 06 01*	Lead batteries	r4 all	8.041	
17 04 01	Copper, Bronze, Brass	r4 all	29.706	
17 04 02	Aluminium	r4 all	5871.721	
17 04 03	Lead	r4 all	8.496	
17 04 04	Zinc	r4 all		
17 04 05	Iron & Steel	r4 all	132262.2	includes 88978 from other yards

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17 04 06	Tin	r4 all		
17 04 07	Mixed Metals	r4 all	22.988	
17 04 11	Cables	r4 all	37.253	
19 12 02	Ferrous Metal	r4 all	77.5	
19 12 03	Non-ferrous Metal	r4 all	3.158	
19 12 12	Other Wastes	r4 all		
20 01 36	WEEE	r4 all		
	brokered waste	r4 all	88,615	

Total -245,281.355

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2.2 Waste sent of site 2018 Ringsend

ARCELORMITTAL GIPUZKOA SL	19-12-02	4274.715
CASH SALES FERROUS.	19-12-03	0.45
CELSA FRANCE SAS	19-12-02	12345.876
CELSA MANUFACTURING UK	12-01-01	736.954
CELSA MANUFACTURING UK	19-12-02	2659.914
CHATARRA IRUNA SA	16-01-06	29331.6
CHATARRA IRUNA SA	19-12-02	0
CLEARWAY LTD	16-01-06	239.18
CLEARWAY LTD	19-10-06	25577.6
CLEARWAY LTD	19-12-02	24.46
MEGASA SIDERURGICA SL	12-01-01	19.18
MEGASA SIDERURGICA SL	19-12-02	29413.2
METAL PROCESSORS	19-12-03	0
NERVACERO SA	12-01-01	25.46
NERVACERO SA	19-12-02	22967.818
SEAN O'REILLY METAL EXPORT LTD	19-12-03	48.06
PLATINUM RECOVERIES LIMITED	19-12-03	0.79
SN MAIA	19-12-02	28014.52
SN SIEXAL	19-12-02	28091.838
59,786 TO OTHER HLM SITES	Total	183771.615

Total 243,557.615For inspection purposes only.
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Environmental Monitoring 2018

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3. SUMMARY REPORT ON EMISSIONS

3.0 Emissions to water

There are two interceptors and four silt traps associated with drainage on the site. Surface water from the site is discharged to the Lower Liffey Estuary from the north of the site at location SW1 .

The only foul drainage from the site is from the office building using drainage which was in place prior to site operations. The drainage goes into a pre-treatment / pumping station that exists on the southern boundary of the site from where it is pumped to the nearby sewage works.

3.1 Surface Water Discharge

Surface water ceased discharge and water was tankered offsite to Rilta Environmental. Waste transfer forms are available on Dublin City Council WRMS system and were also submitted on eden in January 2019.

As of August 2019 HLM are still awaiting confirmation from Irish water regarding connection to sewer outside of gate. The new application for outside the site on the 15th of May and are awaiting a response, IW have said they will prioritize it. On the 12th of July IW confirmed that will be sending a revised offer letter for connection outside the site, we are awaiting this offer. Regarding the Technical Amendment - following a follow up request, the email below from Suzanne Wylde epa was received; "Thank you for your email. Your request for an amendment to the licence is still under assessment and a decision will issue in due course." Regards, Suzanne Wylde Inspector I have no further updates as present, but will update Eden accordingly.

3.2 Groundwater

Ground water sampling report were uploaded to eden for each qtr of 2018. The groundwater results were assessed against the Emission Limit Values for the site discharge, however it is noted that the groundwater is impacted by saline intrusion from the River Liffey Estuary. Conductivity of up to 44,200µS/cm was reported in the groundwater samples indicating saline intrusion, particularly in borehole MW4 adjacent to the tidal inlet.

COD and sulphate were reported above the Emission Limit Value at three of the four groundwater monitoring boreholes. The sulphate exceedances are expected to be due to saline intrusion. Iron was elevated at one of the four locations.

Hydrocarbons were reported above detection limit at MW1A – MW3A. However, the hydrocarbon concentrations were below the Emission Limit Value for mineral oil.

The results were also compared to the Groundwater Regulations for completeness. However, groundwater

beneath the site is not used as a resource and the site is surrounded by the Lower Liffey Estuary, and the area is a tidal inlet. The groundwater sampled is within the Sand superficial deposits which are expected to be in hydraulic continuity with the estuary and the groundwater beneath the site will not be potable.

Boron and chloride were reported above the Groundwater Regulations in all four boreholes, ammonia as N in three, and fluoride and nickel in one borehole.

It is noted that the concentration of metals decreased in the second quarter, but increased again in the third quarter and remained elevated in the fourth quarter (current round). Conductivity and sulphate show the same pattern as the metals, indicating an increased tidal influence during this groundwater sampling round.

As of august 2019 we are still awaiting confirmation from irish water regarding

Summary

Upgrading works are being undertaken at the site and include works on the site drainage to divert surface water discharge to the sewer. A pre-connection enquiry has been made to Irish Water, who has responded to indicate that connection to the Irish Water network can be facilitated and the works required to put a connection agreement in place has been undertaken. We await confirmation from irish water.

3.3 Noise Emissions

Annual Noise report submitted on eden 20/03/18 - compliant

3.4 Dust Emissions

Dust Emission reports have been submitted on eden for 2018 - non complaint due to neighbouring site production storage of cement dust . Results are above the nuisance level however this is due to the neighbouring dusty facilities. HLM have engaged in talks with the neighbouring sites and they have agreed to implement suppression measures in the future to reduce the dust levels being blown onto our site.

3.5 Air emissions from shredding process

Compliant on air monitoring - reports submitted on eden

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1. SCHEDULE OF OBJECTIVES AND TARGETS 2018/2019

Ref No.	Environmental Objective	Date for completion	Person Responsible	Measurement
01	Meet with customers more to ensure the highest quality steel is delivered to site	Ongoing	MB	Monitored by V Boyle
02	Monitor energy consumption (ie: gas oil, water, electricity) to improve energy efficiency in the future.	Ongoing	Cm, JC V Boyle	Monitored by V Boyle
04	Monitor water demand and the volume of trade effluent discharges to improve utilisation in the future.	Ongoing	Cm, JC, V Boyle	Monitored by V Boyle
05	Waste storage plan and fire risk assessment compliance	Ongoing	Cm, TC V Boyle	Monitored by V Boyle
07	upgrade of office building year ending 2019	Complete march 2020	VB	VB
08	carry out a waste characterisation study of mixed metal loads in order to generate the data required for national statistical reporting under ELV directive	May 2018 - completed	Cm /TC	VB
09	- monitor dust depositions levels at site – engage with neighbouring sites to reduces dust generated on site	March 2018, ongoing	CM, VB	
10	- training on site fire refresher and evacuation procedures, qms updates, energy awareness	March 2018- complete	Cm	
11	Iso 9001:2015 transition audits	April 2018 – complete	CM	
12	Achieve 95% recycling/recovery target for ELVs within 2 years. 2017 93% 2018 94% 2019 95%	ongoing	Cm vb	
13	Review of ewc codes for ie sites to ensure elra cramp aer tfs and storage plan are uniform	Ongoing	Cm vb	
14	Rejection of elvs with tyres not removed	Ongoing	Cm mb	

4. COMPLAINTS AND INCIDENTS 2018

No complaints were made in 2018

Incident table 2018

INCI0 15732	P10 02- 01	Other	1. Min or	Christina Monaghan	17/12/2018 14:50	20/12/20 18 15:56	27/12/2 018 08:56	Clo sed
INCI0 15534	P10 02- 01	Explosion	1. Min or	Christina Monaghan	14/11/2018 00:01	16/11/20 18 14:44	19/11/2 018 09:04	Clo sed
INCI0 15344	P10 02- 01	Explosion	1. Min or	Christina Monaghan	12/10/2018 10:02	15/10/20 18 08:49	26/10/2 018 09:04	Clo sed
INCI0 14533	P10 02- 01	Fire	2. Lim ited	Christina Monaghan	05/06/2018 12:45	08/06/20 18 09:12	25/06/2 018 10:59	Clo sed
INCI0 14378	P10 02- 01	Other	1. Min or	Christina Monaghan	10/05/2018 23:00	11/05/20 18 09:06	21/05/2 018 07:50	Clo sed
INCI0 13927	P10 02- 01	Explosion	1. Min or	Christina Monaghan	21/02/2018 09:06	21/02/20 18 15:33	26/02/2 018 14:30	Clo sed
INCI0 13852	P10 02- 01	Breach of ELV	1. Min or	Christina Monaghan	08/02/2018 01:02	08/02/20 18 12:50	04/03/2 019 14:46	Clo sed
INCI0 13727	P10 02- 01	Breach of ELV	1. Min or	Christina Monaghan	08/01/2018 00:00	22/01/20 18 12:15	04/03/2 019 14:46	Clo sed

The main incidents in 2018 have been due to air pressure releases in the shredder and exceedance of ELVS of surface water discharges in the first two months of 2018 before tinkering commenced..

There were five incidents of explosions (air pressure releases) onsite. This is an ongoing issue and Hammond Lane have many control measures in place. HLM also intend to engage with local authorities, gas bottle companies and the health and safety authority regarding this issue.

At Hammond Lane's sites in Ringsend and Ringaskiddy we operate plants that shred baled scrap prior to separation of the constituent metals and non-metals. Baled scrap is mainly End-of-Life Vehicles (ELVs) and also light gauge steel and mixed metal scrap metal. If these bales contain gas cylinders or LPG fuel tanks it is virtually impossible to detect them when they are delivered to our shredder plant for further processing. Unfortunately, when a bale containing a gas cylinder is shredded it will inevitably cause a sudden release of pressure and potentially

combustible gas. Such incidents are potential risks to our employees; complaints about noise from neighbours and damage to the shredder plant. Control measures such as plant design and training are in place to protect employees and while noise emissions exceed recommended limits only instantaneously it does not constitute a statutory nuisance. We would prefer to minimise these incidents. Damage to our plant and equipment and associated downtime cannot be eliminated.

We regularly communicate with our suppliers of baled material to ensure that gas cylinder and LPG fuel tanks are always removed before material is baled. Our efforts are productive in the short term and are not supported by other stakeholders. At these smaller scrap yards, the baling process can also cause the sudden pressure release of combustible gas where it is less controlled or guarded to prevent injury or fire. When an incident occurs at our shredder sites it is the manifestation of a problem that has not been addressed at source, namely the removal of gas cylinders before they are baled.

Hammond Lane would like the Local Authorities and the Health and Safety Agency Authority to support and reinforce its efforts to eliminate these dangerous items from the scrap metal industry. We have been in contact with the compressed gas supplier associations who are the owners of the cylinders. While they share our interest in returning gas cylinders to the compressed gas distributors there is little evidence of any proactive communication with scrap yards to support this. However, like Hammond Lane they have no regulatory or enforcement authority.

When we visit our suppliers we have rarely observed any formal procedures in place for the removal, quarantine and return of gas cylinders. Better regulation and enforcement would support our own efforts and would result in immediate improvements. Longer term it may be necessary to have a “compliance scheme” in place for the control of compressed gas cylinders with a deposit and return system that provides a financial incentive to remove them from scrap yards and return them to the owners for reuse or degassing.

We would suggest a meeting of stakeholders locally and nationally to exchange ideas and hopefully develop a coordinated strategy for dealing with this problem.

4.1 Review of Nuisance Controls

Nuisance controls are always being reviewed, and it seems the current nuisance controls employed at the facility are adequate. Daily perimeter housekeeping check are carried out also.

5. RESOURCE AND ENERGY CONSUMPTION

5.1 Energy Consumption 2018

Type	Consumption and Unit
Electricity	300428 p/a
Gas Oil	180,000 l p/a
Water	3200m3 p/a

6. FINANCIAL PROVISION

In addition, the company has submitted to the Agency an ELRA and cramp and the company has provisions to cater for incidents that may inadvertently arise.

7. MANAGEMENT AND STAFFING STRUCTURE

Director

Paul Murphy /Vincent Boyle

Facility Manager

Mr. Mick Browne

Site Foreman

John Hanley

Accounts Manager

Joe Cochrane

EHS officer

Christina Monaghan

Weighbridge/Dispatch/Transport Manager

Gerry Dwyer

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8. PROGRAMME FOR PUBLIC INFORMATION

Hammond Lane Metal Co. ltd are fully-committed to providing the general public, neighbouring residences and businesses with information relating to the Environmental Performance of the facility if requested.

The facility has a designated meeting room which can be used for the public if they wish to review various reports, etc.

All information in respect to the operation of the facility is maintained onsite and can be viewed upon request. Furthermore, if an individual would like to see the facility in operation, it operates an open-door policy and endeavour to provide information to the public in both a timely and accurate manner.

9. DEVELOPMENT/INFRASTRUCTURAL WORKS

9.1 Works in 2018 –

Full hardstanding of concrete has been undertaken final phase complete September 2019.

Rising main works;

Hammond Lane Metal Co. Ltd, Pigeon House Rd. Update for rising main installation for surface water diversion to IW sewer

History from June to October 2018

- A road opening licence (No. 85/2018) was issued on the 27th of June from the Road Maintenance Services Department approving the works to carry out slit trenches to investigate services and install the rising main using horizontal directional drilling.
- A T2 licence was issued on the 20th of July from the Environment and Transportation Dept of DCC.
- IW would not issue a connection agreement until a road opening licence was issued.
- Once the T2 licence was issued and it was confirmed by DCC that HLMC's contractor (M&P) could install the rising main, Irish Water proceeded to issue the connection agreement which was received by HLMC Ltd. on the 13th of August.
- The signed connection agreement was paid for and returned on the 15th of August 2018.
- Four slit trenches were excavated by M&P under the supervision of the ESB between the 5th and 12th of September. These could only be carried out when the ESB provided supervision.
- Based on the findings of the slit trenches the ESB requested that the rising main be installed in a "dug" trench rather than by horizontal directional drilling (HDD) at a maximum rate of 20 linear meters per day.
- M&P (HLMC contractor) advised that they would be commencing works on the week of 1-5th of October pending agreements on ESB supervision and road opening licence details with DCC.
- On discussion with DCC regarding the extension of the existing T2 licence M&P (HLMC Contractor) were informed that the new requirement of a dug trench required a T1 licence (trench excavation on main road and over 100m long) and a T1 Licence had to be applied for by a service provider, in this case Irish Water.
- In order to maintain a reasonable program for the works we divided the works into 2 areas (i) Works within the Dublin Port control (ii) works in the Public Road

Works within Dublin Port Control (180m)

- Installation of the rising main as far the boundary of the HLMC site commenced on the 5th of November and was completed on the 13th of November
- Works within the control of Dublin Port, from the HLMC site to Pigeon House Rd physically commenced on the 19th of November and were completed as far as Pigeon House Road on the 11th of December.

Works in the Public Road- Pigeon House Rd (330m)

- On the 24th of October RKA wrote to Marina Byrne, the IW Engineer who prepared the first connection agreement, requesting if IW could apply for the T1 licence and either undertake the works in the public road or allow M&P to do the works under their licence. This request was followed up on with emails and phone calls to contacts in IW. A verbal response was received on the 13th of November from Marina Byrne stating that it would be required to apply for a new connection agreement and that only IW contractors could carry out the works.
- On the 15th November RKA submitted a new application for connection.
- On the 17th November RKA received a request from Amanda Coleman in IW requesting why a new a new agreement was required.
- On the 19th November RKA responded and explained why a new agreement was required based on the conversation with Marina Byrne (who had since moved from the connections department)
- On the 3rd of December Amanda Coleman called RKA requesting that an email be sent to IW requesting a refund of the fee paid for the original connection agreement issued in August. Following that email RKA received email confirmation from IW of receipt of the new application.
- On the 11th of December Fionan Ginty (IW Senior Engineer) contacted RKA and said he will be looking after the technical preparation of the new connection agreement and requested again all design/investigation information carried out by RKA and M&P on the proposed rising main.
- On the 14th of December RKA re-issued to Fionan Ginty:-
 - Detail drawings of the rising main
 - Detail drawings of the slit trenches carried out on Pigeon House Rd. by M&P
 - survey of all utilities in the public road carried out by Minerex Geophysics Ltd on behalf of HLMC in December 2017
 - contacts in ESB who organised and supervised the slit trenches carried out by M&P in Pigeon House Rd
- On the 18th of December Fionan Ginty wrote to RKA requesting if ESB will require to supervise the works. RKA replied on the 19th that ESB will likely require to supervise the works and sent the relevant contacts from ESB again.
- On the 20th of December Fionan Ginty emailed RKA saying he expects to issue the revised agreement early in January 2019.

It is expected that a revised connection agreement will be issued and returned by HLMC by the middle of January. Once payment is received a works order will be issued to Irish Water's contractor and a T1 road opening licence will be applied for by the IW contractor. It is estimated that the T1 licence will be issued to the Irish Water contractor in 4 weeks

As of August 2019 HLM still await confirmation from Irish water for connection.

9.2 Planned works for 2019/20

- Connection to sewer
- Complete hardstanding
- Upgrade of Office building in yard
- New weighbridge/ rad detectors
-

The works include the construction of an underground surface water attenuation tank to attenuate contaminated surface water for pumped discharge to the foul sewer outside of entrance on agreement with Irish Water. There has been ancillary works to the drainage system and new full retention separators installed. In separate works approximately 4500sqm of yard surface has been repaired and upgraded with a new reinforced concrete slab to prevent risk of groundwater contamination through damaged areas of the existing slab. The perimeter kerb has been upgraded locally to a level of 3.725m OD minimum to fully contain any run-off on the site.

The drainage works commenced in December 2017 and are almost complete and are due to be completed by the end of April. The yard works commenced in October 2017 will be completed by September 2019.

The proposed development is being carried out under 3.13 of the industrial emissions licence, reg no. P1002-01. The specified engineering works are defined in Schedule D of the licence as "Re-organisation or reconstruction of site drainage".

Further follow on works include the demolition of old offices and weighbridge and construction of new offices & weighbridges in the same location as existing offices and weighbridge, planning permission is currently being obtained for these works prior to commencement. (2019/2020)

Appendix 1

PRTR – submitted via EDEN

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