

Registered Office:
7th Floor O'Connell Bridge House, 27/28
D'Olier Street, Dublin 2, D02 RR99

Mr Brian Duggan
Office of Environmental Enforcement
Environmental Protection Agency
McCumiskey House
Dublin 14

Site Address:
Hollywood Landfill, Hollywood Great,
Nag's Head, Naul, Co. Dublin

E info@imsirl.ie

www.imsirl.ie

Submitted via Eden

21st January 2022

Re: Request to accept waste stream (soil) with elevated TOC, W0129-02

Dear Mr Duggan,

IMS received five (5) loads of JKW contaminated soil and stone from the Aldi Project in Ballina. Upon level 3 inspection, the loads were found to have a high percentage of wastes other than soil and stone (17 05 04) in the form of general wastes such as plastics, timber and metals. IMS contacted the EPA via phone and a Level 2 sample was taken of the material, the results of which are herein.

The results showed slight increase in Total Organic Carbon (TOC) of 6.28% with the LOI at 8.9%. There were no other significant contaminants found with all other parameters within waste acceptance limits.

Soils with elevated TOC may be accepted for disposal at IMS Hollywood under Note 4 of Schedule A.4. of W0129-02 subject to approval by the Agency. Soils with a higher TOC value may be admitted by the Agency, provided the Dissolved Organic Carbon at pH7 (DOC7) value of 500mg/kg is achieved. The DOC is 60mg/kg and the PH is 7.78 from our Level 2 sampling so we request the agencies approval for acceptance of this material.

Should you require any further information please do not hesitate to contact us.

Regards,



Darren O'Reilly
On behalf of Integrated Materials Solutions Limited Partnership

IMS Integrated Material Solutions Limited Partnership

Nags Head
Hollywood
Naul
Co Dublin
Ireland



Attention : Darren O'Reilly
Date : 12th January, 2022
Your reference : Level 2 Testing
Our reference : Test Report 21/19986 Batch 1
Location : Hollywood
Date samples received : 15th December, 2021
Status : Final Report
Issue : 1

One sample was received for analysis on 15th December, 2021 and was scheduled for analysis. Please find attached our Test Report which should be read with notes at the end of the report and should include all sections if reproduced. Interpretations and opinions are outside the scope of any accreditation, and all results relate only to samples supplied.

All analysis is carried out on as received samples and reported on a dry weight basis unless stated otherwise. Results are not surrogate corrected.

Authorised By:



Hayley Prowse

Project Manager

Please include all sections of this report if it is reproduced

Mass of sample taken (kg) =	-	Dry Matter Content Ratio (%) =	69.7
Mass of dry sample (kg) =	0.09	Leachant Volume (l)	-
Particle Size <4mm =	>95%		

EMT Job No	21/19986	Landfill Waste Acceptance Criteria Limits		
Sample No	3	Inert	Stable Non-reactive	Hazardous
Client Sample No	CONNACHT WEED CONTROL JKW			
Depth/Other				
Sample Date	13/12/2021			
Batch No	1			

Solid Waste Analysis				
Total Organic Carbon (%)	6.28	3	5	6
Sum of BTEX (mg/kg)	<0.025	6	-	-
Sum of 7 PCBs (mg/kg)	<0.035	1	-	-
Mineral Oil (mg/kg) (EH_CU_1D_AL)	<45	500	-	-
PAH Sum of 6 (mg/kg)	0.79	-	-	-
PAH Sum of 17 (mg/kg)	1.38	100	-	-

Eluate Analysis	10:1 concn leached	Limit values for compliance leaching test using BS EN 12457-2 at L/S 10 l/kg		
	A10 mg/kg	mg/kg		
Arsenic	<0.025	0.5	2	25
Barium	0.17	20	100	300
Cadmium	<0.005	0.04	1	5
Chromium	<0.015	0.5	10	70
Copper	<0.07	2	50	100
Mercury	<0.0001	0.01	0.2	2
Molybdenum	0.03	0.5	10	30
Nickel	<0.02	0.4	10	40
Lead	<0.05	0.5	10	50
Antimony	<0.02	0.06	0.7	5
Selenium	<0.03	0.1	0.5	7
Zinc	0.05	4	50	200
Chloride	64	800	15000	25000
Fluoride	<3	10	150	500
Sulphate as SO4	372	1000	20000	50000
Total Dissolved Solids	1680	4000	60000	100000
Phenol	<0.1	1	-	-
Dissolved Organic Carbon	60	500	800	1000

--

NOTES TO ACCOMPANY ALL SCHEDULES AND REPORTS

EMT Job No.: 21/19986

SOILS and ASH

Please note we are only MCERTS accredited (UK soils only) for sand, loam and clay and any other matrix is outside our scope of accreditation.

Where an MCERTS report has been requested, you will be notified within 48 hours of any samples that have been identified as being outside our MCERTS scope. As validation has been performed on clay, sand and loam, only samples that are predominantly these matrices, or combinations of them will be within our MCERTS scope. If samples are not one of a combination of the above matrices they will not be marked as MCERTS accredited.

It is assumed that you have taken representative samples on site and require analysis on a representative subsample. Stones will generally be included unless we are requested to remove them.

All samples will be discarded one month after the date of reporting, unless we are instructed to the contrary. Asbestos samples are retained for 6 months.

If you have not already done so, please send us a purchase order if this is required by your company.

Where appropriate please make sure that our detection limits are suitable for your needs, if they are not, please notify us immediately.

All analysis is reported on a dry weight basis unless stated otherwise. Limits of detection for analyses carried out on as received samples are not moisture content corrected. Results are not surrogate corrected. Samples are dried at 35°C ±5°C unless otherwise stated. Moisture content for CEN Leachate tests are dried at 105°C ±5°C. Ash samples are dried at 37°C ±5°C.

Where Mineral Oil or Fats, Oils and Grease is quoted, this refers to Total Aliphatics C10-C40.

Where a CEN 10:1 ZERO Headspace VOC test has been carried out, a 10:1 ratio of water to wet (as received) soil has been used.

% Asbestos in Asbestos Containing Materials (ACMs) is determined by reference to HSG 264 The Survey Guide - Appendix 2 : ACMs in buildings listed in order of ease of fibre release.

Sufficient amount of sample must be received to carry out the testing specified. Where an insufficient amount of sample has been received the testing may not meet the requirements of our accredited methods, as such accreditation may be removed.

Negative Neutralization Potential (NP) values are obtained when the volume of NaOH (0.1N) titrated (pH 8.3) is greater than the volume of HCl (1N) to reduce the pH of the sample to 2.0 - 2.5. Any negative NP values are corrected to 0.

The calculation of Pyrite content assumes that all oxidisable sulphides present in the sample are pyrite. This may not be the case. The calculation may be an overestimate when other sulphides such as Barite (Barium Sulphate) are present.

WATERS

Please note we are not a UK Drinking Water Inspectorate (DWI) Approved Laboratory .

ISO17025 accreditation applies to surface water and groundwater and usually one other matrix which is analysis specific, any other liquids are outside our scope of accreditation.

As surface waters require different sample preparation to groundwaters the laboratory must be informed of the water type when submitting samples.

Where Mineral Oil or Fats, Oils and Grease is quoted, this refers to Total Aliphatics C10-C40.

STACK EMISSIONS

Where an MCERTS report has been requested, you will be notified within 48 hours of any samples that have been identified as being outside our MCERTS scope. As validation for Dioxins and Furans and Dioxin like PCBs has been performed on XAD-2 Resin, only samples which use this resin will be within our MCERTS scope.

Where appropriate please make sure that our detection limits are suitable for your needs, if they are not, please notify us immediately.

DEVIATING SAMPLES

All samples should be submitted to the laboratory in suitable containers with sufficient ice packs to sustain an appropriate temperature for the requested analysis. The temperature of sample receipt is recorded on the confirmation schedules in order that the client can make an informed decision as to whether testing should still be undertaken.

SURROGATES

Surrogate compounds are added during the preparation process to monitor recovery of analytes. However low recovery in soils is often due to peat, clay or other organic rich matrices. For waters this can be due to oxidants, surfactants, organic rich sediments or remediation fluids. Acceptable limits for most organic methods are 70 - 130% and for VOCs are 50 - 150%. When surrogate recoveries are outside the performance criteria but the associated AQC passes this is assumed to be due to matrix effect. Results are not surrogate corrected.

DILUTIONS

A dilution suffix indicates a dilution has been performed and the reported result takes this into account. No further calculation is required.

BLANKS

Where analytes have been found in the blank, the sample will be treated in accordance with our laboratory procedure for dealing with contaminated blanks.

Please include all sections of this report if it is reproduced

All solid results are expressed on a dry weight basis unless stated otherwise.

NOTE

Data is only reported if the laboratory is confident that the data is a true reflection of the samples analysed. Data is only reported as accredited when all the requirements of our Quality System have been met. In certain circumstances where all the requirements of the Quality System have not been met, for instance if the associated AQC has failed, the reason is fully investigated and documented. The sample data is then evaluated alongside the other quality control checks performed during analysis to determine its suitability. Following this evaluation, provided the sample results have not been effected, the data is reported but accreditation is removed. It is a UKAS requirement for data not reported as accredited to be considered indicative only, but this does not mean the data is not valid.

Where possible, and if requested, samples will be re-extracted and a revised report issued with accredited results. Please do not hesitate to contact the laboratory if further details are required of the circumstances which have led to the removal of accreditation.

REPORTS FROM THE SOUTH AFRICA LABORATORY

Any method number not prefixed with SA has been undertaken in our UK laboratory unless reported as subcontracted.

Measurement Uncertainty

Measurement uncertainty defines the range of values that could reasonably be attributed to the measured quantity. This range of values has not been included within the reported results. Uncertainty expressed as a percentage can be provided upon request.

ABBREVIATIONS and ACRONYMS USED

#	ISO17025 (UKAS Ref No. 4225) accredited - UK.
SA	ISO17025 (SANAS Ref No.T0729) accredited - South Africa
B	Indicates analyte found in associated method blank.
DR	Dilution required.
M	MCERTS accredited.
NA	Not applicable
NAD	No Asbestos Detected.
ND	None Detected (usually refers to VOC and/SVOC TICs).
NDP	No Determination Possible
SS	Calibrated against a single substance
SV	Surrogate recovery outside performance criteria. This may be due to a matrix effect.
W	Results expressed on as received basis.
+	AQC failure, accreditation has been removed from this result, if appropriate, see 'Note' on previous page.
>>	Results above calibration range, the result should be considered the minimum value. The actual result could be significantly higher.
*	Analysis subcontracted to an Element Materials Technology approved laboratory.
AD	Samples are dried at 35°C ±5°C
CO	Suspected carry over
LOD/LOR	Limit of Detection (Limit of Reporting) in line with ISO 17025 and MCERTS
ME	Matrix Effect
NFD	No Fibres Detected
BS	AQC Sample
LB	Blank Sample
N	Client Sample
TB	Trip Blank Sample
OC	Outside Calibration Range

HWOL ACRONYMS AND OPERATORS USED

HS	Headspace Analysis.
EH	Extractable Hydrocarbons - i.e. everything extracted by the solvent.
CU	Clean-up - e.g. by florisil, silica gel.
1D	GC - Single coil gas chromatography.
Total	Aliphatics & Aromatics.
AL	Aliphatics only.
AR	Aromatics only.
2D	GC-GC - Double coil gas chromatography.
#1	EH_Total but with humics mathematically subtracted
#2	EU_Total but with fatty acids mathematically subtracted
_	Operator - underscore to separate acronyms (exception for +).
+	Operator to indicate cumulative e.g. EH+HS_Total or EH_CU+HS_Total
MS	Mass Spectrometry.

EMT Job No: 21/19986

Test Method No.	Description	Prep Method No. (if appropriate)	Description	ISO 17025 (UKAS/S ANAS)	MCERTS (UK soils only)	Analysis done on As Received (AR) or Dried (AD)	Reported on dry weight basis
PM4	Gravimetric measurement of Natural Moisture Content and % Moisture Content at either 35°C or 105°C. Calculation based on ISO 11465:1993(E) and BS1377-2:1990.	PM0	No preparation is required.			AR	
TM4	Modified USEPA 8270D v5:2014 method for the solvent extraction and determination of PAHs by GC-MS.	PM8	End over end extraction of solid samples for organic analysis. The solvent mix varies depending on analysis required.			AR	Yes
TM4	Modified USEPA 8270D v5:2014 method for the solvent extraction and determination of PAHs by GC-MS.	PM8	End over end extraction of solid samples for organic analysis. The solvent mix varies depending on analysis required.	Yes		AR	Yes
TM5	Modified 8015B v2:1996 method for the determination of solvent Extractable Petroleum Hydrocarbons (EPH) within the range C8-C40 by GCFID. For waters the solvent extracts dissolved phase plus a sheen if present.	PM8/PM16	End over end extraction of solid samples for organic analysis. The solvent mix varies depending on analysis required/Fractionation into aliphatic and aromatic fractions using a Rapid Trace SPE.			AR	Yes
TM17	Modified US EPA method 8270D v5:2014. Determination of specific Polychlorinated Biphenyl congeners by GC-MS.	PM8	End over end extraction of solid samples for organic analysis. The solvent mix varies depending on analysis required.	Yes		AR	Yes
TM20	Modified BS 1377-3:1990/USEPA 160.1/3 (TDS/TS: 1971) Gravimetric determination of Total Dissolved Solids/Total Solids	PM0	No preparation is required.	Yes		AR	Yes
TM21	Modified BS 7755-3:1995, ISO10694:1995 Determination of Total Organic Carbon or Total Carbon by combustion in an Eltra TOC furnace/analyser in the presence of oxygen. The CO2 generated is quantified using infra-red detection. Organic Matter (SOM) calculated as per EA MCERTS Chemical Testing of Soil, March 2012 v4.	PM24	Dried and ground solid samples are washed with hydrochloric acid, then rinsed with deionised water to remove the mineral carbon before TOC analysis.	Yes		AD	Yes
TM22	Modified BS1377-3:1990 Gravimetric determination of Loss on Ignition by temperature controlled Muffle Furnace (35C-440C). On request modified ASTM D2974-00 LOI (105C-440C)	PM0	No preparation is required.	Yes		AD	Yes
TM26	Determination of phenols by Reversed Phased High Performance Liquid Chromatography and Electro-Chemical Detection.	PM0	No preparation is required.			AR	Yes
TM30	Determination of Trace Metals by ICP-OES (Inductively Coupled Plasma – Optical Emission Spectrometry): WATERS by Modified USEPA Method 200.7, Rev. 4.4, 1994; Modified EPA Method 6010B, Rev.2, Dec 1996; Modified BS EN ISO 11885:2009: SOILS by Modified USEP 6010B, Rev.2, Dec.1996; Modified EPA Method 3050B, Rev.2, Dec.1996	PM17	Modified method BS EN12457-2:2002 As received solid samples are leached with water in a 10:1 water to soil ratio for 24 hours, the moisture content of the sample is included in the ratio.	Yes		AR	Yes

EMT Job No: 21/19986

Test Method No.	Description	Prep Method No. (if appropriate)	Description	ISO 17025 (UKAS/S ANAS)	MCERTS (UK soils only)	Analysis done on As Received (AR) or Dried (AD)	Reported on dry weight basis
TM36	Modified US EPA method 8015B v2:1996. Determination of Gasoline Range Organics (GRO) in the carbon chain range of C4-12 by headspace GC-FID. MTBE by GCFID co-elutes with 3-methylpentane if present and therefore can give a false positive. Positive MTBE results will be re-run using GC-MS to double check, when requested.	PM12	Modified US EPA method 5021A v2:2014. Preparation of solid and liquid samples for GC headspace analysis.			AR	Yes
TM36	Modified US EPA method 8015B v2:1996. Determination of Gasoline Range Organics (GRO) in the carbon chain range of C4-12 by headspace GC-FID. MTBE by GCFID co-elutes with 3-methylpentane if present and therefore can give a false positive. Positive MTBE results will be re-run using GC-MS to double check, when requested.	PM12	Modified US EPA method 5021A v2:2014. Preparation of solid and liquid samples for GC headspace analysis.	Yes		AR	Yes
TM38	Soluble Ion analysis using Discrete Analyser. Modified US EPA methods: Chloride 325.2 (1978), Sulphate 375.4 (Rev.2 1993), o-Phosphate 365.2 (Rev.2 1993), TON 353.1 (Rev.2 1993), Nitrite 354.1 (1971), Hex Cr 7196A (1992), NH4+ 350.1 (Rev.2 1993) – All anions comparable to BS ISO 15923-1: 2013I	PM0	No preparation is required.	Yes		AR	Yes
TM60	TC/TOC analysis of Waters by High Temperature Combustion followed by NDIR detection. Based on the following modified standard methods: USEPA 9060A (2002), APHA SMEWW 5310B:1999 22nd Edition, ASTM D 7573, and USEPA 415.1.	PM0	No preparation is required.			AR	Yes
TM61	Determination of Mercury by Cold Vapour Atomic Fluorescence - WATERS: Modified USEPA Method 245.7, Rev 2, Feb 2005. SOILS: Modified USEPA Method 7471B, Rev.2, Feb 2007	PM0	No preparation is required.	Yes		AR	Yes
TM73	Modified US EPA methods 150.1 (1982) and 9045D Rev. 4 - 2004) and BS1377-3:1990. Determination of pH by Metrohm automated probe analyser.	PM11	Extraction of as received solid samples using one part solid to 2.5 parts deionised water.	Yes		AR	No
TM173	Analysis of fluoride by ISE (Ion Selective Electrode) using modified ISE method 9214 - 340.2 (EPA 1998)	PM0	No preparation is required.			AR	Yes
NONE	No Method Code	PM17	Modified method BS EN12457-2:2002 As received solid samples are leached with water in a 10:1 water to soil ratio for 24 hours, the moisture content of the sample is included in the ratio.			AR	
NONE	No Method Code	PM4	Gravimetric measurement of Natural Moisture Content and % Moisture Content at either 35°C or 105°C. Calculation based on ISO 11465:1993(E) and BS1377-2:1990.			AR	