

Irish Cement

Mr. P. Nolan
Programme Manager
Environmental Protection Agency
Johnstown Castle
Co. Wexford

Irish Cement Limited
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Drogheda
Co. Louth
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www.irishcement.ie

29th March, 2005

Re: IPC Licence 29 – Limerick Cement Works
On-Site Licensed Landfill

Dear Mr. Nolan,

I am writing to you to request a Technical Amendment to IPC Licence 29 in respect of the on-site landfill at Limerick Cement Works. I am making this request so that reference is made under the Licence to the *Council Decision of 19th December 2002 establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex 2 to Directive 1999/31/EC.*

I set out below the background to this request and enclose three Annexes of supporting documentation.

The cement factory at Castlemungret, County Limerick was originally constructed in the 1930's and has been the subject of various expansions since that time. In accordance with normal practice at the time, all significant buildings at the factory, constructed up to the early 1980's, were clad in fibre cement sheeting containing asbestos.

Demolition and Up-Grading of facilities at Limerick Cement Works has been ongoing since the early 1990's and this programme involves the demolition of some structures and the replacement of fibre cement cladding material containing asbestos on others.

Directors
A.M. O'Loughlin *Chairman*,
K. McKnight *Managing*.

C.A. Bannon, J.J. Corbett, R.M. Cunningham,
D.W. Doyle, S. Lynch, E.P. Mc Donnell,
H. Morris, J.B. Nolan, D.I. Rees, T.N. Scully

Registered in Dublin. Number 9212.
Registered Office:
Platin Drogheda Co.Louth

IPC Licence 29 permits the landfilling of materials in the Bunlickey Landfill on site. The manner in which asbestos containing cladding materials maybe landfilling, was specifically outlined in the *Agency's letter of 6.1.99 M29/AP (copy attached in Annex 1)*.

Limerick Works has landfilling the following tonnages in accordance with Agency requirements as follows:

<u>Year</u>	<u>Quantity (Tonnes)</u>
2000	32
2001	93
2002	19

The practice of landfilling asbestos containing cladding materials in accordance with Agency instructions was specifically noted in the *Landfill Conditioning Plan* for the site submitted, as required, to the Agency in July 2002. (Copy attached in Annex 2)

The Council Decision of 19th December 2002 specifically addressed the landfilling of materials containing bound asbestos in landfills for non-hazardous waste. It is noteworthy that the conditions laid down by the EU mirror the original advice from the Agency on the subject in 1999.

Irish Cement Limited now wishes to proceed with the finalisation of its Demolition and Up-grade Programme at Limerick Works.

Drawing Number LK05-017-001-Rev 4 is attached in Annex 3 and outlines the quantities of cladding material involved and the approximate time-scale envisaged.

We wish to draw your attention to three areas of immediate concern:

- (i) Demolition of the Boiler House is currently under way.
- (ii) We have been advised by our Structural Engineers that the Clinker Crane Store is unsafe and should be demolished immediately.
- (iii) The roof of the Palletising Plant is leaking and consequently urgent replacement of sheeting is required.

The timescale outlined for the remaining buildings could be brought forward if requested by the Agency but the first three buildings on the list must be dealt with urgently as a matter of priority.

estimated
680 t
(see plan attached)

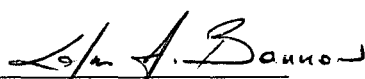
Irish Cement believes that the appropriate environmental solution for the disposal of cladding material associated with the structures outlined in Annex 3 is for the material to be deposited at the Bunlickey Landfill on site in accordance with the Agency advice on the matter and the Council Decision of 19th December 2002.

We now wish to apply for a Technical Amendment to Licence 29 to allow our Programme to be finalised in a timely manner.

In view of the urgency of the matter due to the state of some of the buildings we shall be most grateful if this matter could be dealt with as soon as possible.

We remain at your disposal for any further information you may require.

Yours sincerely


Colm A. Bannon
Technical Director.

Enclosures

- Annex 1 Agency letter of 6.1.99
- Annex 2 Landfill Conditioning Plan
- Annex 3 Drawing Number LK05-017-Rev. 4

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ANNEX 1

Agency's letter of 6.1.99 M29/AP

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FAO

Colm Bannan

COPY
CAB.
MR
EK



An Ghníomhaireacht um Chaomhnú Comhshaoil

Mr. Richard Cunningham
Production Manager
Irish Cement Ltd.
Castlemungret
Co. Limerick

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.

6/1/99

M29/AP

Dear Mr. Cunningham

I refer to your letter and report dated 20/5/98 received by the Agency on 20/5/98 in relation to the Hydrogeological Assessment of Bunlicky Clayfield Pond.

I am to advise you that the report submitted is to the satisfaction of the Agency.

You should note that the Agency is concerned that only those materials which are specified in the IPC Licence or which have been agreed by correspondence with the Agency should be used in the filling operation taking place at the Bunlicky Clayfield Pond. Building rubble, including waste roofing material (some of which may be asbestos-cement containing materials) which arises on your site in the course of site demolition and development may be filled.

A record of the quantities of asbestos-cement containing materials should be maintained, and a record (including a map) should also be kept of the specific location(s) within the fill area where this material is being placed. You are also required not to fill asbestos cement material directly along the waters edge of the Bunlicky Pond, but rather into an excavated cell (or cells). When the placement of the asbestos cement material is completed, you should also ensure that a minimum of 2 meters of back-fill of soil / overburden is placed on top of the filled materials.

Should you have any enquiries about this issue, please contact me by telephone at (053) 60600.

Yours sincerely

Frank Clinton
Licensing and Control

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ANNEX 2

Landfill Conditioning Plan

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ANNEX A - CONDITIONING PLAN FOR EXISTING LANDFILL SITES

WASTE/IPC LICENCE REG NO.	IPC Licence No. 29
LICENSEE	Irish Cement Limited, Limerick Works
LOCATION OF FACILITY	Limerick

CONTACT DETAILS	
Name:	Seamus Breen Production and Environmental Manager
Address:	Castlemungret, Mungret, Limerick
Tel No:	061 - 487200
Fax No.:	061 - 487201

ARTICLE 3(4)	
SCOPE	Please indicate if your landfill serves an Island or an Isolated Settlement. If yes provide supporting evidence. (y / n)
Landfill sites for non-hazardous or inert wastes with a total capacity not exceeding 15,000 tonnes or with an annual intake not exceeding 1,000 tonnes serving islands, where this is the only landfill on the island and where this is exclusively destined for the disposal of waste generated on that island.	N
Landfill sites for non-hazardous or inert waste in isolated settlements if the landfill site is destined for the disposal of waste generated only by that isolated settlement. Where isolated settlement means a settlement with no more than 500 inhabitants per municipality or settlement and no more than five inhabitants per square kilometre and, where the distance to the nearest urban agglomeration with at least 250 inhabitants per square kilometre, is not less than 50km, or with difficult access by road to those nearest agglomerations, due to harsh meteorological conditions during a significant part of the year.	N

Attachment A3 included Yes no not applicable

ARTICLE 4	Existing Landfill Sites	Please indicate one class only
CLASS OF LANDFILL	date of Compliance	
Landfill for hazardous waste	16/7/2002	
Landfill for non-hazardous waste	Latest 16/7/2009	
Landfill for inert waste	Latest 16/7/2009	Yes 16/07/2002

ARTICLE 5(3)		
WASTE & TREATMENT NOT ACCEPTABLE IN LANDFILLS ^{Note 4}	Please indicate if any of the listed wastes are accepted for disposal to landfill (y / n)	Specify the date on which the facility will comply with this requirement (latest date is 16/7/2009 for landfills classified as non-hazardous or inert)
Liquid Waste ^{Note 1}	N	16/07/2002
Waste which, in the conditions of landfill, is explosive, corrosive, oxidising, highly flammable or flammable, as defined in Annex III to Directive 91/689/EEC ^{Note 1}	N	16/07/2002
Hospital and other clinical wastes which are infectious ^{Note 1}	N	16/07/2002
Whole used tyres (excluding tyres used as engineering material) ^{Note 2}	N	16/07/2002
Shredded used tyres ^{Note 3}	N	16/07/2002
Any other type of waste which does not fulfil the acceptance criteria determined in accordance with Annex II of the Landfill Directive ^{Note 1}	N	16/07/2002
Waste which has been diluted or mixed solely to meet the relevant acceptance criteria ^{Note 1}	N	16/07/2002

Note 1: Landfill Directive prohibits the acceptance of these wastes for disposal at 'existing hazardous waste' landfills from 16 July 2002.

Note 2: Landfill Directive requires these not to be accepted for disposal at 'existing hazardous waste' landfills from 16 July 2003, excluding bicycle tyres and tyres with an outside diameter above 1.4m.

Note 3: Landfill Directive requires these not to be accepted for disposal at 'existing hazardous waste' landfills from 16 July 2004.

Note 4: Hazardous waste can only be accepted at landfills classified as landfills for hazardous waste from 16/07/02.

Attachment A5 included	Yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>	not applicable <input type="checkbox"/>
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ARTICLE 6				
WASTE TO BE ACCEPTED IN THE DIFFERENT CLASSES OF LANDFILL	Hazardous Waste Landfill	Non-hazardous Waste Landfill	Inert Waste Landfill	Specify the date on which the facility will comply with this requirement and provide details on measures to meet the specific requirement.
Waste to be treated prior to disposal	16/7/2004	16/7/2009	16/7/2009	16/07/2002 Schedule 3(ii) of IPC Licence no. 29
Ban on any waste other than hazardous waste that fulfils criteria in Annex II being assigned to a hazardous waste landfill	16/7/2004	Not applicable	Not applicable	Not Applicable
Non-hazardous waste landfill may be used for: municipal waste, non-hazardous waste of any other origin and stable, non-reactive hazardous wastes	Not applicable	16/7/2009	Not applicable	Not Applicable
Inert landfills can only accept inert waste	Not applicable	Not applicable	16/7/2002.	See attachment A6

Attachment A6 included Yes no not applicable

ARTICLE 8	
CONDITIONS OF THE PERMIT	Provide details on meeting compliance with the following requirements – where relevant cross refer to your IPC/waste licence:
The Management of the landfill site will be in the hands of a natural person who is technically competent to manage the site; professional and technical development and training of landfill operators and staff are provided.	IPC licence No. 29 Condition 2.3 (Management) and Condition 2.1.11 (Training)
Necessary measures are taken to prevent accidents and limit their consequences.	IPC Licence No. 29 Condition 12
Adequate financial provisions will be made by the applicant	Yes, Annual Budgeting
Landfill project is in line with the relevant waste management plan	Not Applicable

Attachment A8 included yes no not applicable

ARTICLE 9	
CONTENT OF THE PERMIT	Provide details on the following requirements – where relevant cross refer to your waste licence:
Class of landfill	Inert Waste Landfill
Waste type & Total quantity of waste to be deposited	Schedule 3(ii) of IPC Licence No. 29 Lake Volume - Approx. 2.5 million m3
Requirements for preparations, operations and monitoring and control procedures, provisional requirements for the closure and aftercare operations.	IPC licence No. 29, Application for IPC Licence Attachment No. 33.
Obligation to report (waste types, quantities and monitoring)	IPC licence No. 29 Annual Environmental Report

ARTICLE 10	
COST OF THE LANDFILL OF WASTE	Provide details on measures to meet this specific requirement.
Price charged by the operator must include setting up and operational costs, and the estimated costs of the closure and aftercare of the site for at least 30 years.	All costs (including including those for closure and aftercare) are internalised. No wastes accepted from other parties.

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ARTICLE 11				
WASTE ACCEPTANCE PROCEDURES	Hazardous Waste Landfill	Non-hazardous Waste Landfill	Inert Waste Landfill	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
Measures must be place in order to enable holder/operator to show that the waste accepted at the site complies with the permit and fulfils the acceptance criteria set out in Annex II	16/7/2002	16/7/2009	16/7/2009	IPC Licence No. 29 16/07/2002
Measures must be in place to ensure the operator checks documentation, visually inspects the waste at entrance and point of deposit, keeps a register of the waste and provides written acknowledgement of each delivery.	16/7/2002	16/7/2009	16/7/2009	IPC Licence No. 29 16/07/2002
Measures must be in place to ensure that the operator notifies the competent authority if waste not accepted.	16/7/2002	16/7/2009	16/7/2009	IPC Licence No. 29 16/07/2002
Measures to provide for regular visual inspection of waste deposited at island or isolated settlement sites to ensure that only non-hazardous waste accepted	Not applicable	16/7/2009	16/7/2009	Not applicable
Measures to ensure that a register on quantities of waste that are deposited at an exempted landfill site are kept	Not applicable	16/7/2009	16/7/2009	Not applicable

Attachment A11 included yes no not applicable

ARTICLE 12 CONTROL AND MONITORING PROCEDURES IN THE OPERATIONAL PHASE	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
Control and monitoring programme in operational phase as specified in Annex III of the Directive;	16/07/2002 In accordance with IPC Licence No. 29
Operator to inform competent authority of any significant adverse environmental effects and corrective measures to be taken;	16/07/2002 In accordance with IPC Licenc No. 29 Condition 4
Operator to report results of monitoring to competent authority at least once a year;	16/07/2002 In accordance with IPC Licence No. 29 Schedule 6(i) including Annual Environmental Report
Quality control of the analytical operations are carried out by competent laboratories.	Irish Cement Limerick Works has ISO 9002 Registration

Attachment A12 included yes no not applicable

ARTICLE 13 <small>Note 1</small> CLOSURE AND AFTERCARE PROCEDURES	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
Measures must be in place to ensure closure procedures start when relevant conditions in the permit are met; or under the authorisation of the competent authority at the request of the operator; or by reasoned decision of the competent authority.	Closure procedure details to be developed with consultants post Limerick Southern Ring Road completion. This major road development is planned to pass through Bunlickey Clayfield Pond. 16/07/2009
Measures to be in place to ensure that the operator is responsible for maintenance, monitoring & control in the aftercare phase, and informs the competent authority of any adverse environmental effects.	IPC Licence No. 29. As per Attachment number 33 of IPC Licence Application. 16/07/2002
Measures to be in place to ensure that the operator is responsible for monitoring and analysing gas and leachate and the groundwater regime for as long as the competent authority considers that the landfill is likely to cause a hazard.	As per closure plan to be agreed with the Agency 16/07/2009

1. Existing sites which have not closed by 16 July 2001 will be subject to closure requirements of the landfill directive (Articles 7(g) and 13).

Attachment A13 included yes no not applicable

ANNEX 1	GENERAL REQUIREMENTS FOR ALL CLASSES OF LANDFILLS
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WATER CONTROL AND LEACHATE MANAGEMENT	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
Control water from precipitations entering into the landfill body	16/07/2002 Refer Hydrogeological Report submitted in accordance with schedule 6 (i) of IPC Licence No. 29
Prevent surface water and/or groundwater entering into the landfilled waste	16/07/2002 Refer Hydrogeological Report submitted in accordance with schedule 6 (i) of IPC Licence No. 29
Collect contaminated water and leachate	16/07/2002 Refer Hydrogeological Report submitted in accordance with schedule 6 (i) of IPC Licence No. 29
Treat contaminated water and leachate collected from the landfill to the appropriate standard required for their discharge	16/07/2002 Refer Hydrogeological Report submitted in accordance with schedule 6 (i) of IPC Licence No. 29

Attachment B1 included yes no not applicable

PROTECTION OF SOIL AND WATER	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
By the combination of a geological barrier and a bottom liner during the operation/active phase	Not applicable. Refer to Hydrogeological Report noted above.
By the combination of a geological barrier and a top liner during the passive phase/post closure.	Not applicable. Refer to Hydrogeological Report noted above.
Geological barrier no less than 0.5 meter thick giving equivalent protection to one of the following: 1. Landfill for hazardous waste: $k \leq 1.0 \times 10^{-9} \text{ m/s}$; thickness $\geq 5 \text{ m}$. 2. Landfill for non-hazardous waste: $k \leq 1.0 \times 10^{-9} \text{ m/s}$; thickness $\geq 1 \text{ m}$. 3. Landfill for inert waste: $k \leq 1.0 \times 10^{-7} \text{ m/s}$; thickness $\geq 1 \text{ m}$.	Not applicable. Refer to Hydrogeological Report noted above.
Leachate collection and sealing system: Artificial sealing liner (e.g. geomembrane) Drainage layer $\geq 0.5 \text{ m}$	Not applicable. Refer to Hydrogeological Report noted above.
Capping system	Top soil

Attachment B2 included yes no not applicable

GAS MANAGEMENT	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
Measures to control the accumulation and migration of landfill gas	Not Applicable
Landfill gas from landfills receiving biodegradable waste must be collected used to produce energy or flared in manner which minimises damage to or deterioration of the environment and risk to human health	Not Applicable

Attachment B3 included yes no not applicable

NUISANCES AND HAZARDS	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
Measures to minimise nuisances and hazards arising from the landfill through: <ul style="list-style-type: none"> • Emissions of odours and dust • Wind blown materials • Noise and traffic • Birds, vermin and insects • Formation and aerosols • Fires 	16/7/2002. Proper placement of material. IPC Licence No. 29. Implementation of Site Environment Guidelines and Instructions Manual.
Landfill equipped so that dirt originating from the site is not dispersed onto public roads and the surrounding land.	16/7/2002. IPC Licence No. 29. Implementation of Environment Guidelines and Instructions Manual.

Attachment B4 included yes no not applicable

STABILITY	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
Emplacement of waste takes place in such a way as to ensure stability of the mass of waste and associated structures, particularly in respect of avoidance of slippages.	16/07/2002 Appropriate placement of material
Where an artificial barrier is established the geological substratum is sufficiently stable to prevent settlement that may cause damage to the barrier.	Not Applicable

Attachment B5 included yes no not applicable

BARRIERS	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
Landfill shall be: 1. Secure to prevent free access to the site; and 2. The gates shall be locked outside operating hours.	16/07/2002 Area fenced and secured.
The system of control and access to the facility contains a programme of measures to detect and discourage illegal dumping in the facility.	17/07/2002 Management systems in place.

Attachment B6 included yes no not applicable

ANNEX II	WASTE ACCEPTANCE CRITERIA AND PROCEDURES
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WASTE ACCEPTANCE CRITERIA AND PROCEDURES	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
Guidelines for preliminary waste acceptance procedure: Acceptance procedure per Article 11 of the directive. For waste acceptance further requirements are likely to be issued by the Commission.	16/07/2002 Guidelines in place as per IPC Licence No. 29

1. Landfill Operator should Cross Refer to Article 11 to ensure requirements of the Directive are satisfied.

ANNEX III	CONTROL AND MONITORING PROCEDURE IN OPERATION AND AFTER-CARE PHASES
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METEOROLOGICAL DATA	
Is meteorological data collected onsite (y/n)	N
If offsite name of station	Shannon Airport
Is the following data collected daily (operation phase):	N
Volume of precipitation;	N
Temperature (min, max 14.00 h CET);	N
Direction and force of prevailing wind;	N
Evaporation;	N
Atmospheric humidity (14.00 h CET).	N

Attachment D1 included yes no not applicable

EMMISSION DATA: WATER, LEACHATE AND GAS CONTROL

Monitoring Locations

Landfill Gas ^{Note 1}	Not applicable
Surface Water ^{Note 2}	Not Applicable
Ground Water ^{Note 3}	Schedule 5(i) of IPC licence
Leachate ^{Note 4}	Not Applicable
Dust	Refer to IPC Licence No.29
PM ₁₀	Not Applicable
Noise	Refer to IPC Licence No.29
Other monitoring location ^{Note 3}	none

Note 1: Include locations on boundary, within waste mass and emission points from landfill gas flare etc

Note 2: List locations on receiving waters (1 up and 1 down as a minimum)

Note 3: List locations (up and downgradient)

Note 4: Include details on the following where relevant (holding lagoon, lined cells, unlined areas). Sampling and measuring (volume and composition) of leachate must be performed separately at each point at which leachate is discharged from the site – the number of discharge points should be provided with relevant monitoring details.

Note 5: Site Specific monitoring may be required e.g. ecological etc.

Frequency of Monitoring (Some details are provided in Annex III of the Landfill Directive)

Landfill Gas Constituents.

	Operational Phase	After-Care Phase
Boundary Locations	Not Applicable	Not Applicable
Within Waste	Not Applicable	Not Applicable
Landfill Gas Flare/ Combustion Plant	Not Applicable	Not Applicable

Surface Waters & Groundwaters

	Operational Phase	After-care Phase
Surface Water Volume/Flows	Not Applicable	Not Applicable
Surface Water Composition ^{Note 1}	Not Applicable	Not Applicable
Groundwater Level	Not Applicable	Not Applicable
Groundwater Composition ^{Note 1}	IPC Licence No.29 Schedule 5 (i)	IPC Licence No. 29 Schedule 5 (i)

Note 1: Include details of parameters to be tested in Attachment D2.

Leachate Levels and Composition ^{Note 1}

	Operational Phase	After-care Phase
Leachate in Active Cells	Not Applicable	Not Applicable
Leachate in Closed Cells	Not Applicable	Not Applicable
Leachate Wells in unlined areas	Not Applicable	Not Applicable
Lagoon / Holding Tank	Not Applicable	Not Applicable

Note 1: Include details of parameters to be tested in Attachment D2.

Other Site-specific Monitoring ^{Note 1}

	Operational Phase	After-care Phase
Other monitoring stations	Not Applicable	Not Applicable

Note 1: Examples include dust, PM₁₀, noise, ecological. Include details of parameters to be tested in Attachment D2.

DATE for COMPLIANCE

Specify the date on which the facility will comply with the monitoring location and frequency requirements:

DATE FOR COMPLIANCE	16/07/2002	16/7/2002
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Attachment D2 included yes no not applicable

TOPOGRAPHY OF THE SITE: DATA ON THE LANDFILL BODY	Specify the date on which the facility will comply with these requirements and provide details on measures to meet the specific requirement
Structure and composition of landfill body to be done yearly consisting of: 1. Surface occupied by waste; 2. Volume and composition of waste; 3. Methods of depositing; 4. Time and duration of depositing; 5. Calculation of the remaining capacity still available at the landfill.	16/07/2002 Details will be included in the Annual Environment Report submitted to the Agency.
Settling behaviour of the level of the landfill body measured yearly	Not Applicable

Attachment D3 included yes no not applicable

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DECLARATION

Declaration

I/we hereby submit a Conditioning Plan, pursuant to the provisions of the European Council Directive on the Landfill of Waste (1999/31/EC) and Regulations made thereunder.

I/we certify that the information given in this Plan is truthful, accurate and complete (see note below).

I/we have no objection to the provision by the Agency or local authority of a copy of the Plan or parts thereof to any person.


Signature:		_____	_____
Print name:	Seamus Breen	_____	_____
Date:	12/7/2002	_____	_____
Position in organisation:	Production/Environmental Manager	_____	_____
On behalf of (name of organisation):	Irish Cement Ltd. Limerick Works	_____	_____

*Note:

- in the case of a partnership, all partners should sign the declaration; and,
- if the application is signed by an agent/consultant, the proposed licence holder must also sign and date the declaration.

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Company/local authority stamp or seal:



Landfill Conditioning Plan

Irish Cement Limited

Limerick Works

Attachment A6

The landfill at Irish Cement Ltd, Limerick Works, accepts only inert wastes specified in IPC Licence No. 29.

Many of the buildings on site, which were constructed as part of the old wet process plant, which commenced operations in 1938, have been clad with fibre-cement cladding containing asbestos. An on-going programme of demolition to improve the operating environment at the plant is continuing. As part of this programme cladding materials have been removed and landfilled at the Bunlicky Clayfield Pond landfill site. In recent years all landfilling of cladding materials manufactured from asbestos-cement has been carried out in accordance with guidelines issued by the Agency (Reference EPA Letter M29/AP of 6/1/1999).

Irish Cement will continue to landfill cladding material from the site until the existing cladding has been fully replaced with material which has not been manufactured with asbestos.

The procedure to be adopted will be in line with a procedure agreed with the Agency.

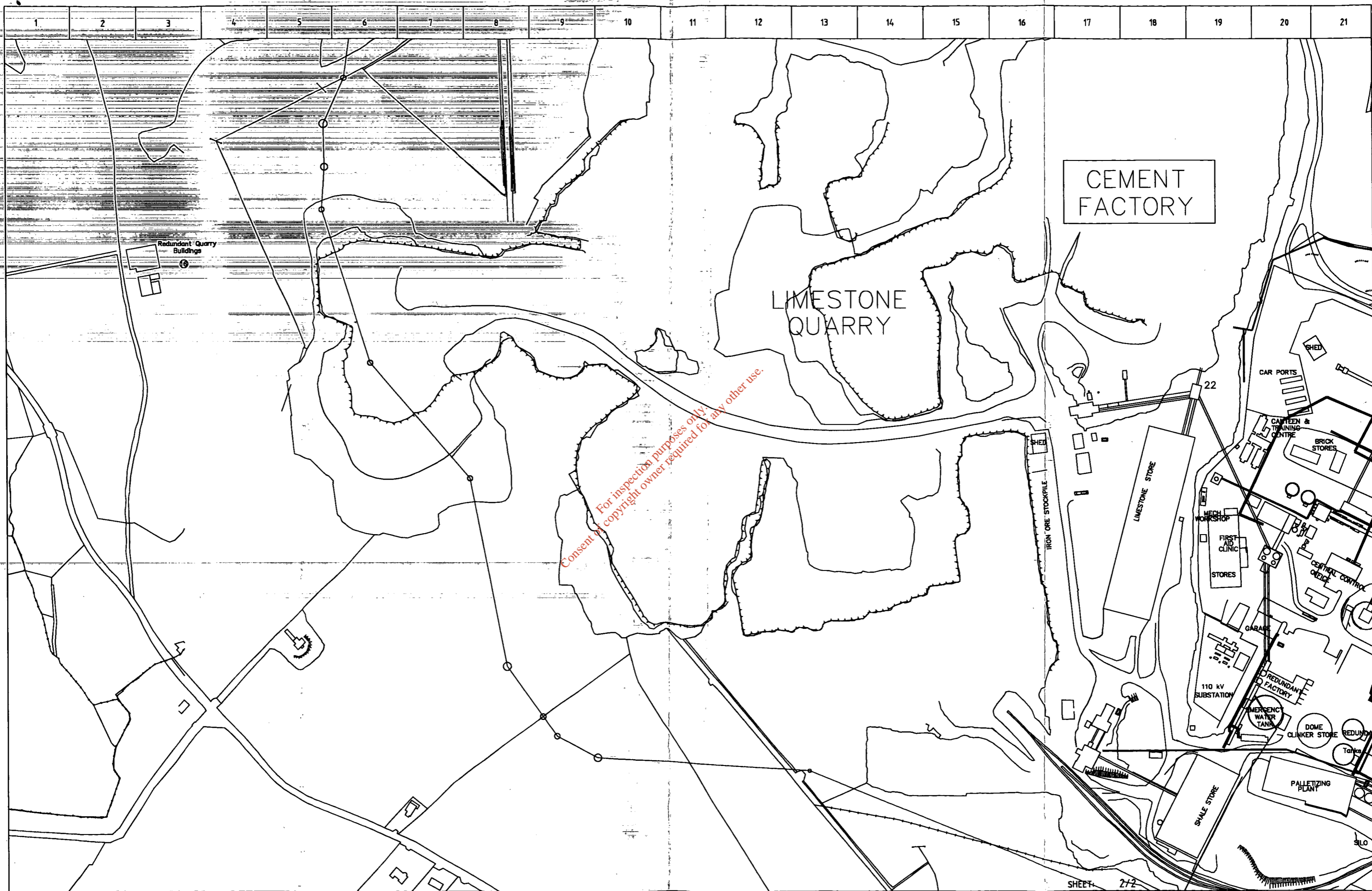
Irish Cement understands that the EU Committee for the adaptation to scientific and technical progress of EC-Legislation on Waste is currently working on this issue and has produced a Draft Commission Decision.

Irish Cement will continue landfilling asbestos containing fibre cement cladding from the site in accordance with the above procedure until final guidance is available from this Technical Adaptation Committee or until otherwise advised by the Agency.

ANNEX 3

Drawing Number LK05-017-001-Rev 4

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CEMENT
FACTORY

LIMESTONE
QUARRY

Redundant Quarry
Buildings

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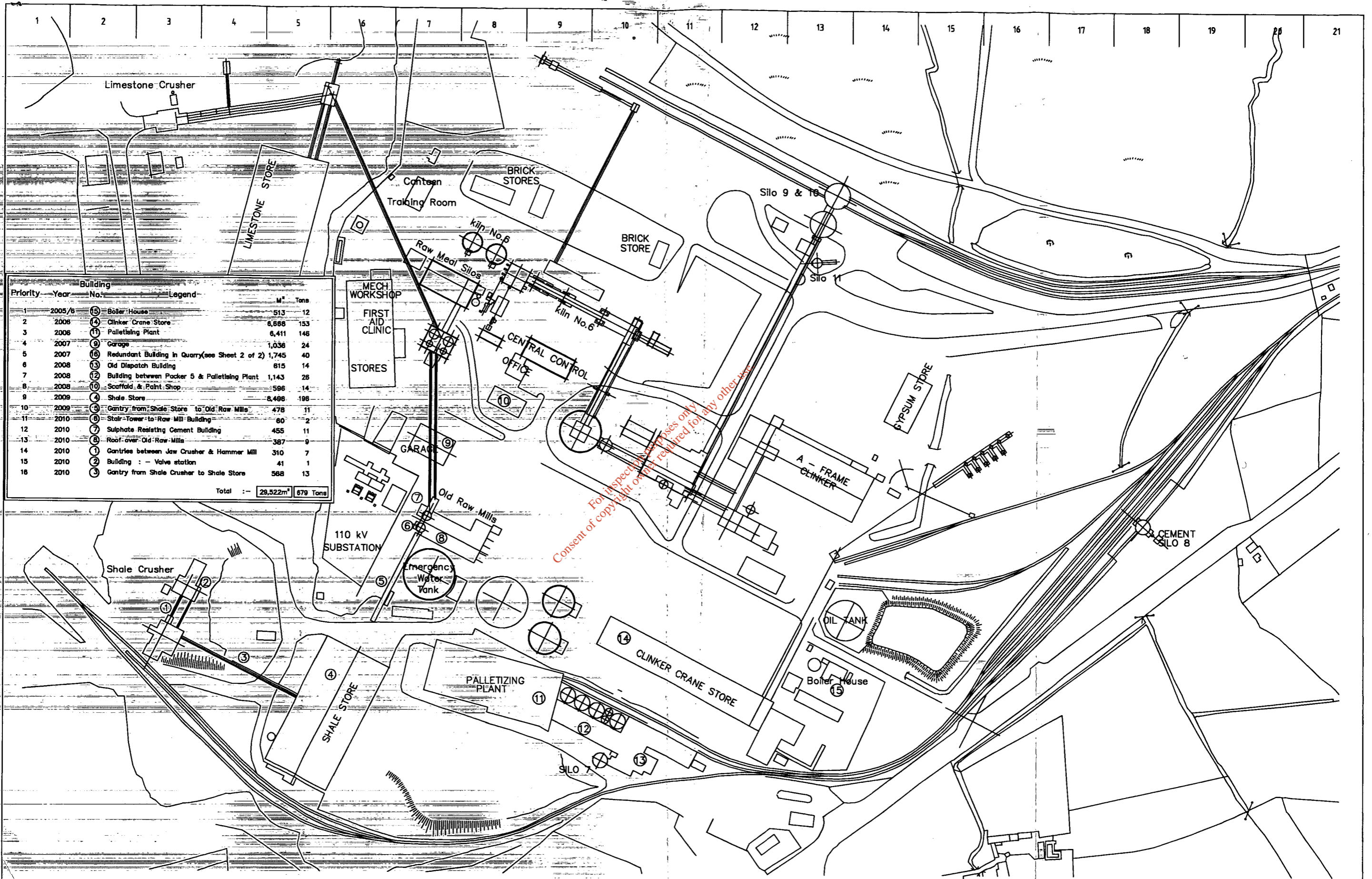
DATE	REV	DESCRIPTION
10/03/06	4	Priority list added

DATE	TITLE
21/12/05	A/C Cladding Limerick Works December 2005
DRAWN BY: PH	

Irish Cement Ltd
Limerick Works
Castlemungret, Co. Limerick
Tel. 061-487200 - Fax. 061-487201



AUTOCAD DIR.	AUTOCAD DIRECTORY
AUTOCAD FILE	FILENAME
DRG. NO.	LK05-017-0001-Rev4



Priority	Year	Building No.	Legend	M ²	Tons
1	2005/6	15	Boiler House	513	12
2	2006	4	Clinker Crane Store	6,666	153
3	2006	11	Palletizing Plant	6,411	148
4	2007	9	Garage	1,036	24
5	2007	16	Redundant Building in Quarry(see Sheet 2 of 2)	1,745	40
6	2008	13	Old Dispatch Building	815	14
7	2008	12	Building between Packer 5 & Palletizing Plant	1,143	26
8	2008	10	Scaffold & Paint Shop	596	14
9	2009	4	Shale Store	6,496	196
10	2009	5	Gantry from Shale Store to Old Raw Mills	478	11
11	2010	6	Stair-Tower to Raw Mill Building	60	2
12	2010	7	Sulphate Resisting Cement Building	455	11
13	2010	8	Roof over Old Raw Mills	387	9
14	2010	1	Gantries between Jaw Crusher & Hammer Mill	310	7
15	2010	2	Building - Valve station	41	1
16	2010	3	Gantry from Shale Crusher to Shale Store	568	13
Total :-				29,522m ²	679 Tons

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DATE	REV	DESCRIPTION	DATE	TITLE	Irish Cement Ltd Limerick Works Castlemungret, Co. Limerick Tel. 061-487200 - Fax. 061-487201	SHEET: 1/2
10/03/06	4	Priority list added	21/12/05	A/C Cladding Limerick Works December 2005		AUTOCAD DIR. AUTOCAD DIRECTORY AUTOCAD FILE FILENAME DRG. NO. LK05-017-0001-Rev4
			DRAWN BY: PH			