CAR2 Compliance Assessment Report 2 for Licensed Waste Management Facilities	Report ID: 240806101904
The Waste and Contaminated Land (Northern Ireland) Order 1997	**Site inspection report Pg 1 of 4**

Name of site	Name of Operator/Licence holder	WML Number
ReGen Waste Ltd		WML 22/59

Name of officers	Date	Time	
[redacted]	06/08/2024	In: 10:19	Out: 12:46

Council Area	Weather Conditions
Newry, Mourne and Down	Dry, Sunny

Type of site	Non-Hazardous Transfer Municipal	Type of inspection	Unscheduled Monitoring
Site operational Status	Receiving Waste	**Site life Status**	Operational

Site areas / Phase inspected Full

Inspection Results NI= Not inspected NA= Not applicable 0= Compliant 1-3 Non-compliant

1	0	Specified Operations	14	NI	Fires on site
2	0	Permitted Waste types	15	NI	Waste acceptance and control Procedures
3	0	Permitted Waste Quantities	16	0	Waste quantity measurement system
4	0	Hours of Operation	17	0	Storage of specified waste
5	0	Staffing and Supervision	18	N/A	Monitoring and control of gases/ vapours/aerosol
6	0	Availability / understanding of licence / Working Plan	19	0	Monitoring/ control of dusts / fibres/ particulates
7	NI	Attendance of Technically Competent Person	20	0	Monitoring and control of odours
8	NI	Maintenance of Financial Provision	21	0	Control of noise
9	0	Engineered site containment / drainage system	22	0	Control of pest infestations
10	NI	Site Identification Board	23	0	Control of litter
11	0	Site Security	24	NI	Security and availability of records
12	0	Control of mud and debris	25	0	Site diary
13	0	Potentially polluting leaks and spillages			

Representatives from Warrenpoint Harbour Authority, NIEA Water Management Unit, Taggarts, ReGen Waste [redacted] and NIEA Waste Licensing [redacted] attended site following concerns raised at the 9 July 2024 DAERA Minister meeting with local elected representatives. Concerns were raised during this meeting that the RDF waste bales were generating leachate that may be contaminating local water quality.

[redacted] (Public Health Agency) also attended the site during this inspection to familiarise himself with the facility and the surrounding area.

The NIEA took an action to investigate this concern and arranged for Water Management Unit sampling staff to attend and capture samples for lab analysis.

Weather conditions during inspection noted was dry, warm and sunny (15 degrees) with a southwest wind of approx. 12mph.

An NIEA odour assessment was completed prior to attending site at various locations in Warrenpoint, the outcome of which is recorded on a separate odour assessment form.

No fly activity observed onsite or within the wider harbour area.

There was no visual observations of leachate generation coming from the Regen RDF bale storage.

Water samples were obtained at three locations in the harbour by NIEA Water Management Unit staff. Taggarts also took samples at these locations. Two of these samples were obtained within the ReGen licence boundary and one was obtained adjacent to the TMet scrap metal storage area. NIEA Water Management Unit will forward a report of the sample results to NIEA Waste Licensing Team.

Sample 1 location: What 3 words reference arts.supposing.witty.
Sample 2 location: What 3 words reference nature.screaming.plums.
Sample 3 location: What 3 words reference layover.cocoons.called.

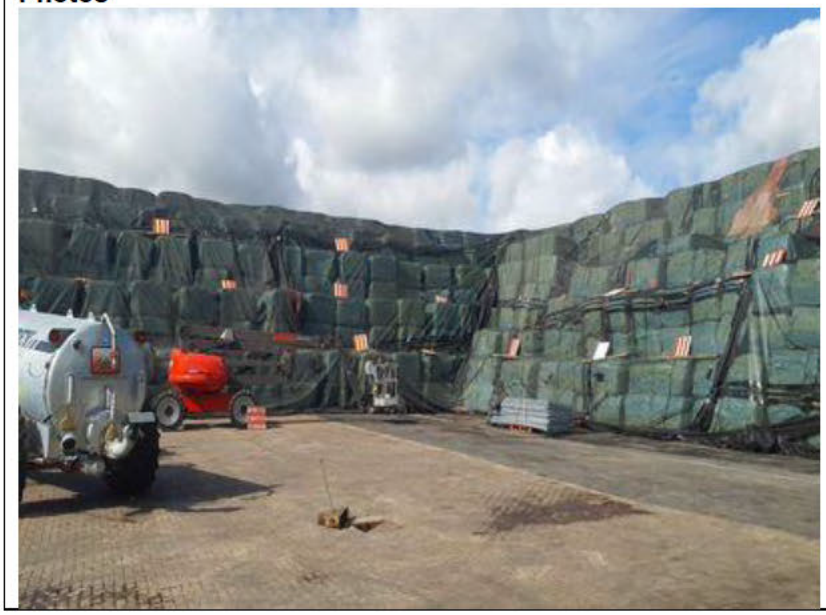
ReGen RDF bale management plan observed and noted there to be 17,179 tonnes on-site yesterday 05 August 2024. RDF bales observed as produced in weeks 24, 25, 29, 30, 31 and were stacked 8 bales high.

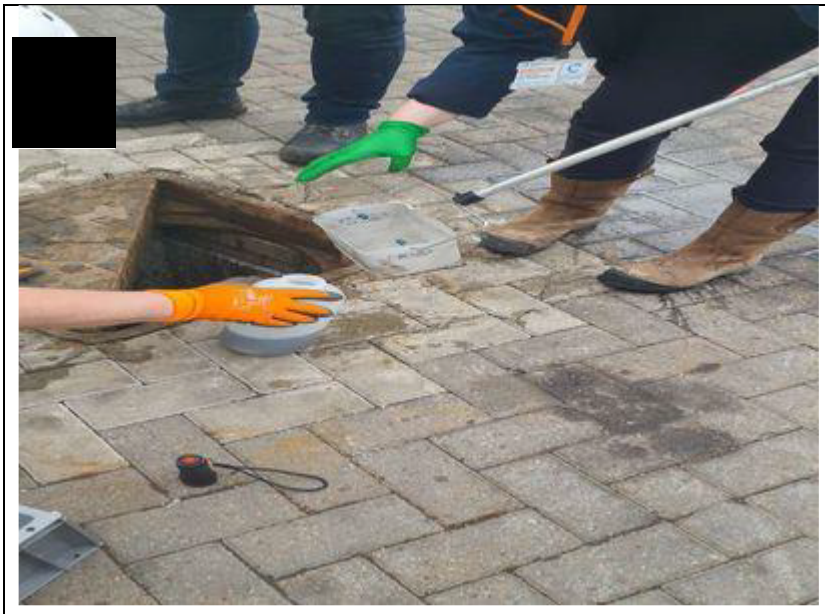
Actions

Letter Request	Continuation sheet

Officer's Signature	**Operator / licence holder signature Name & position**
[redacted]	[redacted]

Photos





From: [redacted]
To:
Subject: FW: 2400154 INV FCMT Warrenpoint Analysis Results
Date: 27 August 2024 17:55:49
Attachments: 2400154 INV FCMT Samples Warrenpoint.xlsx
image001.png
Importance: High

[redacted]
Waste Management Licensing Team
Regulation Unit | NIEA
17 Antrim Road, Tonagh, Lisburn, BT28 3AL
Tel: [redacted]
E-mail: [redacted]

From: [redacted]
Sent: Tuesday, August 27, 2024 5:11 PM
To: [redacted]
Cc: [redacted]
Subject: 2400154 INV FCMT Warrenpoint Analysis Results
Importance: High

Hi [redacted]

Please find attached the preliminary analysis results for the four investigation samples taken at FCMT Warrenpoint on the 06/08/24.

Best Wishes

[redacted]
Water Management Unit
Northern Ireland Environment Agency
17 Antrim Road | Tonagh | Lisburn | BT28 3AL
Tel: [redacted]

TI 2400154 - INVESTIGATION : FCMT SAMPLES, WARRENPOINT

Sample Description		**1. Regen yard, Sample Point**	**2. T-Met Combined, Sample Point**
Analysis	**Unit**		
pH	pH Units	7.9	7.8
Biological Oxygen Demand ATU 5Days at 20̊	mg/L	<5	49
Total Ammonia as N	mg/L	0.11	< 2.5
Chloride as Cl	mg/L	11.2	24
Chemical Oxygen Demand as O_2	mg/L	19	805
Conductivity @ 25^{o}C	µS/cm	130	180
Total Phosphorus as P	mg/L	0.51	1.13
Nitrite as N	mg/L	<0.020	**N/D**
Nitrate as N (by calculation)	mg/L	<0.50	**N/D**
Alkalinity as $CaCO_3$	mg/L	17.7	63.1
Dissolved Organic Carbon NPOC	mg/L	3.47	**N/D**
Suspended Solids	mg/L	12	1138
Mercury (Dissolved)	µg/L	<0.00500	<0.00500
Mercury (Total)	µg/L	<0.00500	0.00716
Aluminium (Dissolved)	mg/L	<0.04	<0.04
Aluminium (Total)	mg/L	<0.10	2.13
Calcium (Dissolved)	mg/L	12.6	14.1
Calcium (Total)	mg/L	13.0	20.5
Iron (Dissolved)	mg/L	<0.04	0.064
Iron (Total)	mg/L	0.144	11.5
Potassium (Dissolved)	mg/L	1.53	1.59
Potassium (Total)	mg/L	1.60	2.03
Magnesium (Dissolved)	mg/L	1.27	1.23
Magnesium (Total)	mg/L	1.26	2.56
Manganese (Dissolved)	mg/L	<0.01	0.022
Manganese (Total)	mg/L	<0.01	0.128
Sodium (Dissolved)	mg/L	8.49	8.88
Sodium (Total)	mg/L	8.66	9.57
Zinc (Dissolved)	µg/L	483	9.92
Zinc (Total)	µg/L	577	1220
Sulphate (Dissolved)	mg/L	18.7	17.3
Sulphate (Total)	mg/L	19.3	20.7
Vanadium (Dissolved)	µg/L	0.827	2.71
Vanadium (Total)	µg/L	1.02	11.0
Nickel (Dissolved)	µg/L	1.37	6.30
Nickel (Total)	µg/L	1.68	22.9
Copper(Dissolved)	µg/L	2.05	<1.0
Copper (Total)	µg/L	4.47	27.8
Arsenic (Dissolved)	µg/L	0.714	2.16

Arsenic (Total)	µg/L	0.804	5.66
Cadmium (Dissolved)	µg/L	<0.05	<0.05
Cadmium (Total)	µg/L	0.051	0.827
Lead (Dissolved)	µg/L	<0.25	1.03
Lead (Total)	µg/L	2.37	163
Chromium (Dissolved)	µg/L	0.288	0.368
Chromium (Total)	µg/L	0.560	19.1
Hexavalent Chromium (Dissolved)	µg/L	0.094	<0.05
Trivalent Chromium (Dissolved)	µg/L	<0.25	0.368

N/D Not Determined (Significant VOG)

3. **HGV Side,** **Sample Point**	**4.** **Tanker Sample,** **Clean Water**
7.4	7.5
69	<5
< 2.5	<0.04
38	10.5
177	16
293	127.00
0.85	0.5
N/D	<0.020
N/D	<0.50
53.6	15.9
N/D	2.58
78	<4
<0.00500	
0.0101	
<0.04	
0.907	
47.5	
51.5	
0.645	
5.18	
15.7	
16.2	
4.61	
5.31	
0.123	
0.161	
40.9	
43.1	
71.5	
414	
30.7	No sample
33.4	
7.53	
11.5	
15.8	
16.8	
3.71	
20.0	
3.08	

5.05
<0.05
0.146
0.622
12.4
16.2
22.9
<0.05
16.2

From: [redacted]
To: [redacted]
Subject: FW: Water Sample Results Summary
Date: 06 September 2024 13:33:44
Attachments: image001.png
Re-Gen Warrenpoint - Sample Results Summary.docx
image002.png

As attached and below please see the results and summary report from the samples obtained from ReGen on 6 August 2024.

Please save this to file.

Thanks [redacted]

[redacted]
Waste Management Licensing Team
Regulation Unit | NIEA
17 Antrim Road, Tonagh, Lisburn, BT28 3AL
Tel: [redacted]
E-mail: [redacted]

[redacted]
Sent: Friday, September 6, 2024 11:49 AM
To: [redacted]
Subject: Water Sample Results Summary

[redacted]

Surface water sample results summary report as discussed.

Kind regards

[redacted]

[redacted]
23 Bedford Street, Belfast, BT2 7EJ
[redacted]
http://www.wdr-rt-taggart.com

Taggarts

[redacted]

Waste Management Licensing Team – Regulation Unit NIEA
Klondyke Buidling, Gasworks Business Park,
Lower Dromore Road, Belfast
BT72JA

23rd August 2024

RE: Water Sample Analysis from Re-Gen Bales Storage Area

Following the DAERA Minister Meeting on July 9, 2024, concerns arose about RDF bales stored on-site potentially generating leachate that could contaminate local water quality. The NIEA investigated, joined by representatives from WHA, Taggarts, Re-Gen Waste, and the Public Health Agency. Water samples were collected from three locations in the harbor, representing surface water intercepted by the site and the Ports drainage system. NIEA's Water Management Unit obtained samples from these locations, while Taggarts took duplicate samples. Two of the samples came from manholes within the site boundary, situated in an upgradient location—one near the HGV Parking Area and the other near the Seatruck side. The third sample was taken adjacent to the TMET Scrap Metal storage area.

Concerns surrounding the RDF bales impacting the local water quality is non-likely, due to the following operational procedures at the site:

- **Short Bale Storage limit:** Although the site's Waste Management License (WML) specifies that the oldest stock on-site should not exceed a 3-month storage limit, Re-Gen makes efforts to ensure that stock is shipped within 6 weeks.
- **Enhanced Bale Wrapping:** Bales are wrapped a minimum of 12 times before storage. The sides have approximately 25 layers. This wrapping procedure exceeds industry standards for bale sealing.
- **Fine Netting:** Fine netting covers all bales, facilitating the shedding of clean rainwater from the stockpile into the site's drainage infrastructure.

Re-Gen's baled storage area and operational procedures exceed the standards of the RDF industry code of practice.

The key parameter indicators for leachate from non-hazardous waste typically include Ammoniacal Nitrogen and Chloride. Based on Taggarts' experience with other consented sites (such as landfill sites and recycling facilities), the benchmark for ammoniacal nitrogen falls within a range of 600 mg/L to 1,500 mg/L. Additionally, the typical benchmark range for chloride is between 1,000 mg/L and 1,800 mg/L.

Samples from each of the named locations were sent to McQuillan Environmental (UKAS Accredited) for laboratory Analysis. The findings from these results are as follows:

Table 1.1 Sample Results

Parameter	Control Limit (Typical for Surface Water Discharged from a Consented Site)	Manhole 1 (closest to HGV Parking Area)	Manhole 2 (adjacent to T-MET operations)	Manhole 3 (closest to Seatruck)
Ammoniacal Nitrogen (mg/l)	1mg/l	0.32	<0.11	0.13
BOD (mg/l)	5mg/l	41.7	16.6	3.36
Chloride (mg/l)	250mg/l	27.2	11.6	11.7
COD (mg/l)	180mg/l	149	213	<25
Electrical Conductivity (uS/cm)	-	228	138	140
pH (Units)	6.0-9.0	6.82	7.13	7.06
Suspended Solids (mg/l)	50mg/l	119	178	10.0

The results for Suspended Solids and BOD are likely influenced by other port activities. Furthermore, the BOD results appear to be correlated with the levels of Suspended Solids at each sample location. Since there is no indication of elevated ammoniacal nitrogen and chloride levels, the BOD is not attributed to leachate.

The results presented in Table 1.1 indicate no evidence of leachate in the drainage system. Furthermore, during the site walkover, there was no indication of leachate on the site's hardstanding or around the bale storage area. The water samples were collected from three manholes near the RDF storage area before the drainage system flows to an interceptor at the port prior tor discharge. The interceptor provides additional treatment to the flow before discharge.

From: [redacted]
To: [redacted]
Subject: FW: 2400154 INV FCMT Warrenpoint Analysis Results
Date: 10 September 2024 15:04:29
Attachments: image001.png
2400154 Investigation FCMT, Warrenpoint.pdf
Importance: High

See attached for saving to the ReGen files please the WMU lab results for our samples taken on 6 August 2024 at the Harbour.

These are the confirmed results now.

[redacted] – could you prepare a desk based CAR form for these results, which would link to the one completed on 6 August 2024. Our assessment would be limited in terms of WML conditions assessed. I am prepared to sign off on the CAR form once we have agreed wording.

Thanks [redacted]

[redacted]
Waste Management Licensing Team
Regulation Unit | NIEA
17 Antrim Road, Tonagh, Lisburn, BT28 3AL
Tel: [redacted]
E-mail: [redacted]

From: [redacted]
Sent: Monday, September 2, 2024 4:45 PM
To: [redacted]
Cc: [redacted]
Subject: RE: 2400154 INV FCMT Warrenpoint Analysis Results
Importance: High

Hi [redacted]

Please find attached the confirmed results the four investigation samples taken at FCMT Warrenpoint on the 06/08/24. Please can you confirm if there are any legislative limits associated with these samples?

Many Thanks
[redacted]

[redacted]
Water Management Unit
Northern Ireland Environment Agency
17 Antrim Road | Tonagh | Lisburn | BT28 3AL
Tel: [redacted]

From: [redacted]
Sent: Friday, August 30, 2024 9:17 AM
To: [redacted]
Subject: RE: 2400154 INV FCMT Warrenpoint Analysis Results

Hi [redacted]

Please provide the legislative values that you wish us to assess against.
(For example, IPRI provide permit limits and regulation team, provide consent to discharge limits).

We are analytical chemists with our main function generating the evidence and not providing interpretation against waste legislation – this is outside out remit. We are no way experts in waste. That would be down to yourselves as the waste team.

Thanks
[redacted]

From: [redacted]
Sent: Friday, August 30, 2024 8:49 AM
To: [redacted]
Cc: [redacted]
Subject: RE: 2400154 INV FCMT Warrenpoint Analysis Results

Thanks [redacted] it was very useful to have sight of these prelim results in advance of our meeting on Wednesday.

I look forward to receiving the confirmed results and any narrative that could be provided around any evidence of leachate triggers in these results.

I need to close this action off with the Private Office and Minister i.e. confirm if there are leachate concerns from the RDF waste bales or not.

Thanks [redacted]

[redacted]

Waste Management Licensing Team
Regulation Unit | NIEA
17 Antrim Road, Tonagh, Lisburn, BT28 3AL
Tel: [redacted]
E-mail: [redacted]

[redacted]
Sent: Tuesday, August 27, 2024 5:11 PM
To: [redacted]
Cc: [redacted]
Subject: 2400154 INV FCMT Warrenpoint Analysis Results
Importance: High

Hi [redacted]

Please find attached the preliminary analysis results for the four investigation samples taken at FCMT Warrenpoint on the 06/08/24.

Best Wishes

[redacted]
Water Management Unit
Northern Ireland Environment Agency
17 Antrim Road | Tonagh | Lisburn | BT28 3AL
Tel: [redacted]

TI 2400154 - INVESTIGATION : FCMT SAMPLES, WARRENPOINT

Sample Description		Sample Point 1. Regen yard	Sample Point 2. T-Met Combined	Sample Point 3. HGV Side	Sample Point 4. Tanker Sample, Clean Water	Analysis Method	Analysis Date
Analysis	Unit						
pH	pH Units	7.9	7.8	7.4	7.5	M0387	06/08/2024
Biological Oxygen Demand ATU 5Days at 20	mg/L	<5	49	69	<5	M0145	08/08/2024
Total Ammonia as N	mg/L	0.11	< 2.5*	< 2.5*	<0.04	M0456+M0172*	07+09*/08/2024
Chloride as Cl	mg/L	11.2	24*	38*	10.5	M0456+M0173*	07+12*/08/2024
Chemical Oxygen Demand as O_2	mg/L	19	805*	177*	16	M0411	12+13*/08/2024
Conductivity @ 25°C	µS/cm	130	180	293	127	M0387	06/08/2024
Total Phosphorus as P	mg/L	0.51	1.13	0.85	0.5	M0457	08/08/2024
Nitrite as N	mg/L	<0.020	N/D	N/D	<0.020	M0456	15/08/2024
Nitrate as N (by calculation)	mg/L	<0.50	N/D	N/D	<0.50	M0456	15/08/2024
Alkalinity as $CaCO_3$	mg/L	17.7	63.1	53.6	15.9	M0454	08/08/2024
Dissolved Organic Carbon NPOC	mg/L	3.47	N/D	N/D	2.58	M0455	06/08/2024
Suspended Solids	mg/L	12	1138	78	<4	M0152	07/08/2024
Mercury (Dissolved)	µg/L	<0.00500	<0.00500	<0.00500		M0318	07/08/2024
Mercury (Total)	µg/L	<0.00500	0.00716	0.0101		M0318	07/08/2024
Aluminium (Dissolved)	mg/L	<0.04	<0.04	<0.04		M0410	08/08/2024
Aluminium (Total)	mg/L	<0.10	2.13	0.907		M0410	08/08/2024
Calcium (Dissolved)	mg/L	12.6	14.1	47.5		M0410	08/08/2024
Calcium (Total)	mg/L	13.0	20.5	51.5		M0410	08/08/2024
Iron (Dissolved)	mg/L	<0.04	0.064	0.645		M0410	08/08/2024
Iron (Total)	mg/L	0.144	11.5	5.18		M0410	08/08/2024
Potassium (Dissolved)	mg/L	1.53	1.59	15.7		M0410	08/08/2024
Potassium (Total)	mg/L	1.60	2.03	16.2		M0410	08/08/2024
Magnesium (Dissolved)	mg/L	1.27	1.23	4.61		M0410	08/08/2024
Magnesium (Total)	mg/L	1.26	2.56	5.31		M0410	08/08/2024
Manganese (Dissolved)	mg/L	<0.01	0.022	0.123		M0410	08/08/2024
Manganese (Total)	mg/L	<0.01	0.128	0.161		M0410	08/08/2024
Sodium (Dissolved)	mg/L	8.49	8.88	40.9		M0410	08/08/2024
Sodium (Total)	mg/L	8.66	9.57	43.1		M0410	08/08/2024
Zinc (Dissolved)	µg/L	483	9.92	71.5		M0410	08/08/2024
Zinc (Total)	µg/L	577	1220	414		M0410	08/08/2024
Sulphate (Dissolved)	mg/L	18.7	17.3	30.7	No sample	M0410	08/08/2024
Sulphate (Total)	mg/L	19.3	20.7	33.4		M0410	08/08/2024
Vanadium (Dissolved)	µg/L	0.827	2.71	7.53		M0405	07/08/2024
Vanadium (Total)	µg/L	1.02	11.0	11.5		M0405	07/08/2024
Nickel (Dissolved)	µg/L	1.37	6.30	15.8*		M0405	07+14*/08/2024
Nickel (Total)	µg/L	1.68	22.9	16.8*		M0405	07+14*/08/2024
Copper(Dissolved)	µg/L	2.05	<1.0	3.71		M0405	07/08/2024
Copper (Total)	µg/L	4.47	27.8*	20.0		M0405	07+14*/08/2024
Arsenic (Dissolved)	µg/L	0.714	2.16	3.08		M0405	07/08/2024
Arsenic (Total)	µg/L	0.804	5.66	5.05		M0405	07/08/2024
Cadmium (Dissolved)	µg/L	<0.05	<0.05	<0.05		M0405	07/08/2024
Cadmium (Total)	µg/L	0.051	0.827	0.146		M0405	07/08/2024
Lead (Dissolved)	µg/L	<0.25	1.03	0.622		M0405	07/08/2024
Lead (Total)	µg/L	2.37	163*	12.4		M0405	07+14*/08/2024
Chromium (Dissolved)	µg/L	0.288	0.368	16.2		M0405	07/08/2024
Chromium (Total)	µg/L	0.560	19.1	22.9		M0405	07/08/2024
Hexavalent Chromium (Dissolved)	µg/L	0.094	<0.05	<0.05		M0438	07/08/2024
Trivalent Chromium (Dissolved)	µg/L	<0.25	0.368	16.2		M0438	07/08/2024

N/D Not Determined (Significant VOG)

Transcribed By: [redacted]

Checked By: [redacted]

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: ReGen Warrenpoint Harbour - WML 22/59 - NIEA CAR form for desktop review of water samples.
Date: 15 October 2024 11:01:51
Attachments: image001.png
WML 22-59 Desktop review of water samples CAR 15.10.2024.pdf

Hi all

Please find attached a NIEA desktop assessment report form in relation to the water sampling exercise carried out on 6 August 2024.

Thanks [redacted]

[redacted]
Waste Management Licensing Team
Regulation Unit | NIEA
17 Antrim Road, Tonagh, Lisburn, BT28 3AL
Tel: [redacted]
E-mail: [redacted]

CAR2 Compliance Assessment Report 2 for Licensed Waste Management Facilities	Report ID: 240913153511

The Waste and Contaminated Land (Northern Ireland) Order 1997	Site inspection report Pg 1 of 2

Name of site	Name of Operator/Licence holder	WML Number
ReGen Waste Ltd	ReGen Waste Ltd	WML 22/59

Name of officers	Date	Time	
[redacted]	15/10/2024	10:00	10:30

Council Area	Weather Conditions
Newry, Mourne and Down	N/A – Desktop review

Type of site	Non-Hazardous Transfer Municipal	Type of inspection	Unscheduled Monitoring – Desktop review of Sample Results
Site operational Status	Receiving Waste	Site life Status	Operational

Site areas / Phase inspected N/A – Desktop review of water sample results

Inspection Results NI= Not inspected NA= Not applicable 0= Compliant 1-3 Non-compliant

1	NI	Specified Operations	14	NI	Fires on site
2	NI	Permitted Waste types	15	NI	Waste acceptance and control Procedures
3	NI	Permitted Waste Quantities	16	NI	Waste quantity measurement system
4	NI	Hours of Operation	17	NI	Storage of specified waste
5	NI	Staffing and Supervision	18	NI	Monitoring and control of gases/ vapours/aerosol
6	NI	Availability / understanding of licence / Working Plan	19	NI	Monitoring/ control of dusts / fibres/ particulates
7	NI	Attendance of Technically Competent Person	20	NI	Monitoring and control of odours
8	NI	Maintenance of Financial Provision	21	NI	Control of noise
9	0	**Engineered site containment / drainage system**	22	NI	Control of pest infestations
10	NI	Site Identification Board	23	NI	Control of litter
11	NI	Site Security	24	NI	Security and availability of records
12	NI	Control of mud and debris	25	NI	Site diary
13	NI	Potentially polluting leaks and spillages			

Comments

This is a desktop review of the laboratory results received following a site inspection undertaken on the 6th of August 2024, in which water samples were obtained by NIEA sampling staff for analysis at 3 locations within Warrenpoint Harbour.

The 3 sampling locations were selected to capture a representation of the surface water/runoff intercepted by the Regen facility and the Warrenpoint Harbour wider drainage system. Further detail on this is found in the Compliance Assessment of 06/08/2024 Report ID: 240806101904. In summary, this sampling exercise was in relation to local concerns regarding the RDF waste bales producing leachate.

The samples were analysed for various parameters by the NIEA Water Management Unit, Chemistry Department between 06/08/2024 – 15/08/2024. The final sample results were received by the Waste Licensing team on 02/09/2024.

The results from 7 key parameters are presented in the table below as these are considered as key indicators of leachate pollution in relation to waste management facilities.

Of these 7, the 2 key parameters which would indicate leachate from non-hazardous waste are Ammoniacal Nitrogen and Chloride. The other 5 parameters, which may indicate the presence of leachate, are suspended solids, BOD, COD, pH and Conductivity.

Parameter	Sample Point 1 (Regen yard)	Sample Point 2 (T-MET combined)	Sample Point 3 (HGV side)	Sample Point 4 (Tanker Sample, Clean Water)
Ammoniacal Nitrogen (mg/l)	0.11	<2.5	<2.5	<0.04
Chloride (mg/l)	11.2	24	38	10.5
BOD (mg/l)	<5	49	69	<5
COD as O_2 (mg/l)	19	805	177	16
Suspended Solids (mg/l)	12	1138	78	<4
pH (uS/cm)	7.9	7.8	7.4	7.5
Conductivity @ 25°C	130	180	293	127

Based on the parameters presented in the summary table above, there are no elevated concentrations in sample point 1 (ReGen) that would indicate that the sample is contaminated by water that has come into contact with waste, i.e. leachate. The results are consistent with clean water, and this is evidenced by the comparable concentration of the same parameters tested on sample point 4 (Tanker).

While some of the results for sample point 2 (T-Met) and sample point 3 (HGV side) are elevated, the fact that the Chloride and the Ammoniacal Nitrogen results are within acceptable ranges suggests the BOD and suspended solids are not attributed to leachate.

The samples collected at sample point 2 (T-Met) and sample point 3 (HGV side) are not considered to be fully representative of the runoff from where waste bales are stored on the site. Due to the drainage regime at Warrenpoint Harbour, these locations receive drainage from wider parts of the site and are, therefore, not strictly representative of the drainage from the bale storage area.

In addition Warrenpoint Harbour encompasses a range of processing activities, some of which are non-waste related and not regulated by the NIEA. Due to the nature and scale of these other activities, it is possible there is a correlation between these and the elevated results from sample point 2 (T-Met) and sample point 3 (HGV side).

In summary, based on the samples obtained on the 06/08/2024, the subsequent results received and based on visual observations by NIEA officers of the Regen activities, there is insufficient evidence to support concerns that leachate is being generated from the RDF storage and is subsequently entering the drainage system.

Actions
None.

Letter Request	Continuation sheet

Officer's Signature	**Operator / licence holder signature Name & position**
[redacted]	N/A Emailed to the operator Regen Waste Ltd as related to a desktop assessment.