

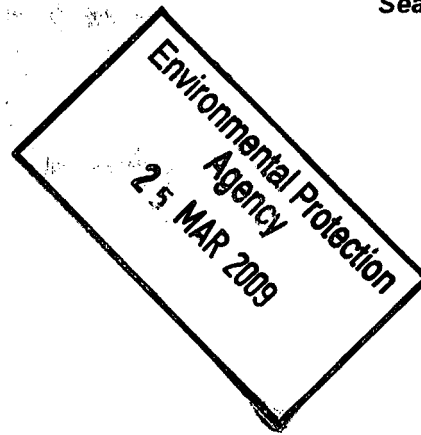
Sub no 1.



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

ENVIRONMENTAL HEALTH OFFICERS SERVICE, GALWAY,
Health Service Executive,
West City Centre,
Seamus Quirke Road,
Galway.

(091) 523 122
(091) 529 415



Our Ref:

Your Ref:

/mm

23rd March, 2009.

Environmental Protection Agency
H.Q. PO Box 3000
Johnstown Castle Estate
County Wexford

Re : WO253-01 .Waste Licence Application, Ballinaglun West , Cree Co. Clare

Dear Sirs

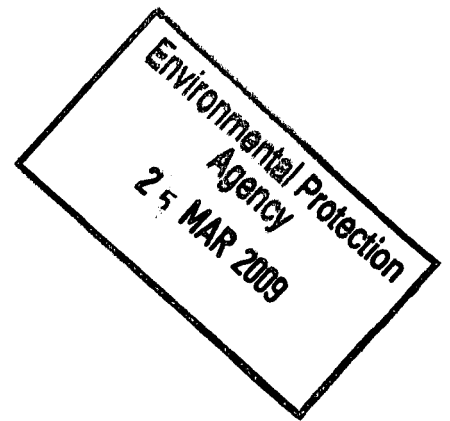
Please find attached response for the Environmental Health Service

Yours faithfully,

Maurice Mulcahy,
Area Chief Environmental Health Officer.

Enc

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Mr Richard P. Fitzgerald
Principal Environmental Health Officer

Re: Waste Licence application for Clean (Ire) Refuse and Recycling Ltd for facility/premises located at Ballinagun West, Cree, Kilrush, Co. Clare.

Assigned Register Number by EPA – W0253-01

Introduction:

Clean (Ire) Refuse and Recycling Ltd., Cree, Co. Clare operate an existing waste transfer station located in a rural area on c.2.6ha site in the townland of Ballinagun West. The facility has been in existence since 1984 with the main waste activity being dry recyclables processing. The facility operates a waste collection service from domestic and commercial customers under permits for Co. Clare, Co. Limerick, Limerick City and Co. Kerry. All waste that is collected is processed at this site in Cree, Co. Clare. The proposed development will be located at the existing Clean (Irl) Refuse & Recycling Ltd site to accommodate an increase in annual tonnage intake, the introduction of new waste processing activities and the expansion of the site area from c.2.6ha to c.3.0ha. The Environmental Impact Statement has been prepared in support of a Waste Licence Application to the Environmental Protection Agency and subsequently to support a planning application to Clare County Council.

Clean (Irl) Refuse & Recycling Ltd is currently permitted under Clare County Council Waste Permit 002/07/WPT/CL, granted 25th June 2006. This permit is granted under Waste Management Acts 1996-2005 and the Waste Management (Permit) Regulations 1998. The permit becomes extinct on 25th December 2008. However under the transitional arrangements of article 3(4) of the Waste Management Facility Permit and Registration) Regulations, S.I. No. 821 of 2007 (as amended by the Waste Management (Facility Permit) (Amendment) Regulations S.I. No. 86 of 2008), the existing Waste Permit 002/07/WPT/CL will continue to be valid providing a Waste Licence Application has been lodged with the Environmental Protection Agency prior to this date. The transitional arrangements under article 3 945) state that: 'if the WP activity is a type that requires a licence under 2007 Regulations the WP holder shall apply for a Licence within 180 working days of 01/06/2008 and the WP continues under the 1998 Regs until a decision is taken to grant or refuse the licence at which point the WP will lapse'.

The facility existing annual tonnage intake is capped at 21,000 tonnes for waste handling and at 5,000 tonnes for the annual disposal fraction to landfill. The basis for the

preparation of an Environmental Impact Statement for the development arises from instruction from Clare Co. Co. Planning Section to carry out a sub-threshold Environmental Impact Assessment of the potential effects the development of this site may have on the surrounding environment and sensitive receptors. The proposed project, which will upgrade existing activities at the site and introduce new activities, is being developed by Clean (Irl) Refuse & Recycling Ltd. The development of the site will allow the facility to expand the business to include new waste processing methods and increase the current tonnes per annum from 21,000 tonnes to 64,600 tonnes.

The proposed infrastructure development will include:

- Biostabilisation building with installation of in-vessel tunnels
- Extension to existing processing buildings
- Relocation of glass bunkers
- Provision to End of Life Vehicle unit
- Relocation of existing diesel tank banded storage area
- Wheelie bin/truck wash service area
- Wheel wash
- Biomass Recovery Plant
- Hardstanding skip storage area

The development of the site will permit the continuation of existing waste processes which includes:

- Dry recyclable processing
- Wet waste processing
- Baling of material
- Dropdown skip processing
- Timber shredding processing
- Construction and Demolition waste processing

The introduction of new waste processes/activities which will include:

- Biostabilisation (in-vessel tunnels in an aerated system) of brown waste
- End of Life Vehicle processing
- Wheelie bin/truck wash
- Wheel wash
- Biomass recovery and electricity production
- Skip storage

Detail submissions are included in the Environmental Impact Statement regarding the above processes.

I visited the existing site on 6th February 2009 with my colleague Ms Fiona Healy. We were received by site manager Mr Paddy Hedigan, who explained the existing process and proposed works.

Public Health nuisance complaints have not been made to this department regarding the existing facility since its commencement. I have also contacted the Environment Section Clare Co. Co. in this regard.

I have carried out a desk-study of the documentation submitted with this waste licence application with particular reference to areas of environmental/public health concerns. Impacts of the proposed development can also be further reviewed under the headings of:

- Noise
- Air Pollution and Dust
- Odour
- Water Contamination
- Accumulation of Waste
- Rodent Control

These categories with mitigation procedures are expansively covered in the submission.

The recommendation of this office are outlined as follows:

Noise:

- (i) A health nuisance shall not be caused by noise generated from this development due to operation of machinery, vehicular traffic or other disturbances.
- (ii) Initial noise-monitoring should be implemented on commencement of proposed development during operational hours to ensure that noise levels do not exceed the baseline of 55 dBA Leq, off-site or to the extent that a nuisance is caused to local residents.

Air Pollution and Dust

- (i) The development must comply with the Air Pollution act 1987.
- (ii) A Public Nuisance must not be caused by this development or associated vehicular traffic due to omission of dust, smoke, dirt, grit, fumes or other pollutants.

Odour:

- (i) All necessary precautions must be put in place to prevent emittance of malodour or gaseous odour from this development. Malodours (including methane gas) can occur from decomposition of refuse and waste. If such a problem occurs at this plant mitigation measures must be put in place by the developers and monitored by the Local authority and E.P.A.

Water Contamination:

- (i) Surface waters or ground waters in proximity to the development must not be polluted by surface run-off or leaching of effluents.
- (ii) Any local drinking water sources including domestic private well supplies must not be contaminated by any run off or effluent from the development.
- (iii) Is a monitoring programme required for local water quality?
- (iv) Any water serving drinking water points at this plant must comply with E.C. (Drinking Water) Regulations 2007.

Public Health Nuisance:

- (i) All necessary precautions must be put in place to prevent or avoid any nuisance or potential nuisance as defined by Section 107 of the Public Health (Ireland) Act 1878 especially Sub-Section (4) which refers to avoidance of any accumulation or deposit, which is a nuisance or injurious to health. This clause can be applied specifically or generally to prevent unwarranted or lengthy accumulation of storage of refuse or waste, within the site.

Rodent Control:

- (i) A detailed rodent control plan must be in place for this development. Ideally it should be formulated by a reputable pest control company. All internal and external bait points should be included on a layout drawing of the proposed development. A detailed contingency plan should also be in place in case of a major infestation by rodents.

Rory O'Dea
Senior Environmental Health Officer