

## INSPECTORS REPORT

**WASTE LICENCE REGISTER NUMBER:** 106-2

**APPLICANT:** Brúscar Bhearna Teoranta

**FACILITY:** Carrowbrowne, Headford Road, Galway

**INSPECTOR:** Kealan Reynolds

**INSPECTOR'S RECOMMENDATION:** That a revised waste licence be granted subject to a number of conditions.

### (1) Introduction

Brúscar Bhearna Teoranta (Barna Waste) have applied for a review of their existing waste licence (Reg. No. 106-1 issued 18/12/00) for the operation of a non-hazardous waste transfer station at Carrowbrowne, Co. Galway, approximately 8km north of Galway City. The facility is located adjacent to Carrowbrowne landfill site and is licensed to accept up to of 126,000 tonnes of non-hazardous waste per annum. Barna Waste provide a skip and household waste collection service in Galway City and County. The facility currently accepts approximately 50,000 tonnes of waste per annum. Since the waste licence was granted, Barna Waste have developed their facility and have constructed a picking line, cardboard/plastic baling area and mixed waste handling area, all of which are housed within the 4,500m<sup>2</sup> waste transfer building. The principal amendments proposed to the existing waste licence in the review application are as follows:

1. Extend the existing facility boundary to include an additional 2.25ha of land which lies immediately adjacent to the existing facility.
2. Construct a new building on the extended facility for the operation of a composting facility and a construction and demolition waste recovery area
3. Increase the total licensed waste intake at the facility from 126,000 tonnes per annum up to 166,000 tonnes per annum. The proposed increase relates to the acceptance of biodegradable waste for composting (not previously accepted under waste licence 27-1) and C&D waste. The maximum annual quantities of biodegradable and C&D wastes proposed to be accepted at the facility is 40,000 and 50,000 tonnes, respectively (see Section 2 below).
4. Relocation of the Civic Waste Facility to the extended area of the facility.

The recommended Proposed Decision (PD) provides for the extension and development of the facility as proposed by the applicant. The classes of activity applied for by the applicant are Classes 11, 12 and 13 of the Third Schedule and Classes 2, 3, 4, 12 and 13 of the Fourth Schedule. Class 13 of the Third Schedule is the principal activity.

**A plan showing the location and proposed layout of the facility to which the application relates is provided in Appendix 1.**

<b>Quantity of waste (tpa) to be accepted</b>	166,000
<b>Environmental Impact Statement Required</b>	Yes, I have assessed the EIS and consider it to be in compliance with the EIA Regulations
<b>Number of Submissions Received</b>	6

### Site Visits

<b>Date</b>	<b>Personnel</b>	<b>Comments</b>
14/02/02	Mick Henry & Cormac MacGearailt	Site Notice Compliant

31/01/03	Kealan Reynolds	Inspection as part of enforcement of waste licence 106-1
24/02/03	Brendan Wall & John Gibbons	Audit of the Facility

## **(2) Facility Development Status**

Barna Waste have obtained planning permission for all of the buildings currently in place at the facility and Galway County Council have also granted planning permission for the construction of the proposed composting unit at the facility. The proposed new composting/C&D waste recovery building will be fully enclosed and will cover an area of approximately 12,600m<sup>2</sup>. The applicant has proposed two options for the use of the new building so as to allow for the relatively unpredictable nature of their business (i.e. awarding of Local Authority contracts, level of construction in the Galway area over the next number of years, etc.):

Option A – The proposed new building would comprise of **four** composting aisles and associated waste acceptance and pre-treatment area, compost post treatment and storage areas and an air collection and treatment system. It is proposed that this Option would treat a maximum of 40,000 tonnes of biodegradable waste per annum with the C& D waste being restricted to the current tonnage of 30,000 (as specified in waste licence 106-1).

Option B – The proposed new building would comprise of **two** composting aisles and the additional space would be used as a C&D waste recovery area. Under this scenario, the total quantity of biodegradable waste to be accepted is 20,000 tonnes per annum with a corresponding increase in the C&D to 50,000 tonnes per annum. The C&D waste recovery area would be fully enclosed and would house a series of trommels, shredders and screens for the processing waste.

The composting technology proposed for the facility is the “hanger” type system (currently in use in Europe) and each composting aisle will be 14.5m wide and 70m in length and have a full aeration system built into the floor of the aisles. It is expected that the composting of 40,000 tonnes of biodegradable waste will produce in the region of 14,000 tonnes of compost per annum. The applicant has proposed that the larger part (80-90%) of the waste to be treated at the facility will consist of separately collected household biowaste (vegetable, fruit and garden waste) with lesser quantities (10-20%) of slurries from the agri-food sector being accepted. As part of the waste licence application the licensee carried out an odour impact assessment of the proposed composting activities on the surrounding environment. The modelling completed predicts (assuming suitably sized water scrubbers and biofilters are provided) that the proposed composting activities (processing 40,000tpa) would not have an adverse impact on any sensitive receptors in the vicinity of the facility. The only areas that would lie within the 5ou/m<sup>3</sup> odour contour (98 %-ile) are located on the nearby landfill site. The recommended PD requires that negative pressure be maintained throughout the new building (as proposed by the applicant). All process air will be collected and passed through a water scrubber and biofilter prior to discharge via 4 stacks which are located 15m above ground level.

The development of the facility will also include the relocation of the civic waste facility, the provision of a second weighbridge and associated surface water and wastewater drainage systems. All services and drainage systems which are currently in place at the existing facility will be extended to the proposed extension. Any effluent generated in the proposed composting unit will be reused in the process where possible. All other wastewaters will be collected and discharged to sewer under the control of Galway City Council. The contents of the Section 52 response from Galway City Council have been incorporated into the recommended PD.

### **(3) Enforcement Summary re Waste Licence 106-1**

The Agency has issued five notifications of non-compliances to Barna Waste since it was licensed in December 2000 and the majority of the non-compliances issued related to the completion of infrastructural works at the facility. The applicant has completed a major programme of development works at the facility over the past number of years and they have increased the waste handling capacity at the facility. No complaints have been received in relation to the operation of the Barna Waste facility since it was licensed by the Agency.

The facility was audited by the Agency in 2001 and a total of 11 non-compliances were noted. The most recent audit of the facility (February 2003) noted 12 non-compliances and these related to issues such as the need for better training, inadequate recording of waste tonnages, the waste transfer building has not been fully enclosed, landscaping not carried out and the use of hauliers used who don't have collection permits. In response to the 2003 Audit the applicant has given a verbal undertaking (Audit Report not issued yet) to complete any outstanding infrastructural works at the facility without further delay and issues such as correct maintenance of waste records have been resolved since the audit.

### **(4) Waste Management, Air Quality and Water Quality Management Plans**

The Waste Management Plan for the Connaught Region was adopted in September 2001 and it refers to the provision of a construction and demolition waste recovery facility, materials recovery facility and green waste composting plant in the vicinity of Galway City. One of the overall policies of the Waste Management Plan for the Connaught Region is the diversion of waste from landfill and the proposed development would contribute to the achievement of this policy.

### **(5) Submissions/Complaints**

Six valid submissions were received in relation to this waste licence review application. An overview of all valid submissions received is provided below. This includes a summary of all issues raised in the submissions and shows how these issues are dealt with in the recommended PD.

#### ***1. Two submissions were received from the Western Regional Fisheries Board(WRFB):***

- a) The facility should only be licensed after the site and adjacent waters are declared free of contamination. If the contamination of the stream to the north of the facility is due to the disposal of nitrogenous material at the old landfill site it should be addressed in an aftercare plan.*
- b) The facility should not be licensed until the Agency issue BATNEEC Guideline for the waste sector.*
- c) All minor drains adjacent to the facility shall be piped in order to prevent direct contamination of the watercourse in the case of an accidental spillage. All accidental spillages shall be notifiable to the WFB.*
- d) The stockpiling of any intake material, recycled or segregated materials should not be allowed externally except under cover.*
- e) The WFB express concerns in relation to the location of the facility in an area that is impacted by extreme flood events and also raised concerns that the facility has not been declared free of contamination. It is also suggested that all wastewaters should be collected and discharged to the Galway City main drainage system. The WFB consider that the EIS lacks data on fish populations.*

### **Inspectors Response**

- a) The issue of the aftercare of the landfill that is adjacent to the Barna Waste facility is subject to a separate waste licence application and it is not the responsibility of Barna Waste. There is no evidence to suggest that the Barna Waste facility itself is contaminated and any emissions to the stream to the north of the facility will consist of clean surface water.
- b) In 2003 the Agency made 2 BAT Notes available as draft documents and will publish these documents in full in the near future i.e. for Bat Notes for Landfill and Waste Transfer and a 3<sup>rd</sup> BAT Note is being drafted for the Waste Treatment Sector. In preparing the recommended PD for the Barna Waste facility I have had regard to Section 40 (4) of the Waste Management Act 1996.
- c) The recommended PD requires that emissions to surface water are made at one location only and that all fuel storage areas are adequately bunded. In addition there are no open drains which run through the facility. Condition 10.2 of the recommended PD requires that the WRFB be notified of any incident relating to discharges to surface water.
- d) Condition 4.1 of the recommended PD requires that all waste processing shall be carried out indoors and the recommended PD also requires that all waste storage areas shall drain to the on-site wastewater collection system. In addition all waste for disposal shall also be stored indoors at the facility.
- e) The natural ground levels shall be raised by 2-3m prior to the construction of the proposed extension to the facility. The boundary of the facility is located beyond the boundary of the disused landfill and there is no evidence to suggest that the facility is having a significant impact on receiving waters. The recommended PD requires that all wastewaters generated at the facility are discharged to the Galway City Council sewer. I consider that the EIS submitted with the review application complies with the EIA Regulations.

### **2. Two submissions were received from the Western Health Board (WHB) in which a number of issues were raised:**

- a) *The WHB consider that the facility shall be adequately manned and supervised at all times and that no heavy construction equipment should be operated prior to 8am Mon-Fri or 9am on Sat & Sun and after 6pm Mon-Sat and shall not be operated at anytime on Sundays and Bank Holidays. In addition the WHB recommend that the applicant shall implement an EMS at the facility and the system should be regularly reviewed and best practical environmental options applied at all times.*
- b) *During the construction phase at the facility best practical means shall be employed to minimize air blown dust being emitted from the facility. In addition smoke, grit, dust, ash, acid spray odour or liquid shall not be emitted from the premises in such a manner that may cause nuisance.*
- c) *The transfer station shall be equipped with a vehicle wash so as to ensure that mud and dirt are not deposited on the surrounding road network. All waste shall be handled indoors and any loads of waste with a high percentage of organic material shall be sent directly to landfill. Adequate measures shall be in place to prevent the contamination of groundwater by run-off.*
- d) *No waste shall be burnt at the facility and measures shall be put in place to deal with fires and accidental chemical spills at the facility. In addition adequate welfare facilities for staff (e.g. changing & shower facilities).*
- e) *All noise shall be minimized at source and the building shall be fitted with sound attenuators where possible. It is proposed that noise levels 1m from the façade of any noise sensitive location shall not exceed the background noise levels by*

*10dB(A) during the day and shall not exceed the background noise levels for evening and nighttime.*

- f) *Adequate pest proofing and control measures shall be implemented at the facility to ensure the ongoing prevention of pests.*

**Inspectors Response**

- a) Condition 2 of the recommended PD provides for the management of the facility and this includes the preparation of an EMS. Condition 1 of the recommended PD sets out the hours of operation of the facility and prohibits the acceptance of waste (other than at the Civic Waste Facility) on Sundays and Bank Holidays and, regardless of this, Conditions 5 and 7 of the recommended PD sets out the monitoring requirements and emission limit levels for noise emissions from the facility.
- b) Condition 6 of the recommended PD sets out conditions for the control of nuisances from the facility.
- c) Each of the recommendations referred to in the submission above are provided for in the recommended PD with the exception of the issue pertaining to loads of waste with a high percentage of organic waste. Any loads with a high organic content will be sent for composting in the composting unit (when constructed).
- d) Condition 8.4 prohibits the burning of waste at the facility and Condition 8 sets out contingency arrangement for the facility in the case of a fire and/or an accidental spillage. The issue of staff welfare does not come within the realms of this recommended PD
- e) Condition 7 and 5 of the recommended PD provide for the monitoring of and emission limit values for noise emissions from the facility respectively. Night time noise levels from the facility shall not exceed 45dB(A) at the nearest noise sensitive location during night time and shall not exceed 55dB(A) during the daytime.
- f) Condition 6 of the recommended PD provides for the control of nuisances at the facility, including pest control.

**3. *Two submissions were received from Duchas***

*Duchas stated that they have no comments to make on the application.*

**Inspectors Response**

The contents of this submissions have been noted.

Signed \_\_\_\_\_  
Kealan Reynolds, Inspector,  
Environmental Management & Planning.

Dated:

**APPENDIX 1**  
**LOCATION MAP**