

**INSPECTORS REPORT  
WASTE LICENCE REGISTER NUMBER 136-1**

**Ahern Industrial Services Ltd., Glanmire, Cork**

**Recommendation: The proposed decision as submitted to the Board be approved**

**(1) Introduction:**

Ahern Industrial Services Ltd. have applied to operate a new waste transfer station and recycling facility at Sarsfieldcourt Industrial Estate, Sarsfieldcourt, Glanmire, Co. Cork, approximately 8km northeast of Cork city and 5km north of Glanmire. A decision to grant planning permission for this facility was issued by Cork County Council on 01/06/2000 but this is now under consideration by An Bord Peanála (Correspondence received from An Bord Peanála stated that the appeal would be determined before 30/01/2001). The site of the proposed development (1.6ha) is in an industrial estate which has a mixture of industrial/commercial properties and the predominant landuse in the vicinity of the estate is agricultural pastureland. There are 18 domestic residences within approximately 0.5km of the proposed development and St. Stephen's Hospital is located approximately 1 km south of the proposed development. The National Route N8 runs in a north south direction 1.5km east of the site while the Regional Route R616 and a third class road bound the entrance to the estate and the western boundary of the site, respectively. **A plan showing the location of the facility to which the application relates is provided in Appendix 1.**

The applicant has applied to accept 50,000 tonnes of wastes in year 1 of the operation and the wastes accepted will consist primarily of non-hazardous commercial and industrial (98%) along with small quantities of household (1.2%) and construction/demolition (0.8%) waste. The total waste accepted at the facility is predicted to increase to a maximum of 95,000 tonnes in the fifth year of operation. The wastes will be processed within the main waste transfer building, the recyclable materials removed and the residual waste sent to landfill. A segregation at source service is provided to client companies and all recyclable waste will be brought to the waste transfer building for processing while the non-recyclable fraction will be transported directly to landfill. The applicant also provides a skip hire service for private individuals.

The applicant has proposed to recover 25% of all wastes accepted at the facility and in addition, the proposed decision requires proposals to further pursue recycling and recovery of certain waste in line with national policy.

<b>Quantity of waste (tpa)</b>	95,000 tonnes (max.)
<b>Environmental Impact Statement Required</b>	Yes
<b>Number of Submissions Received</b>	78

**SITE VISITS:**

<b>DATE</b>	<b>PURPOSE</b>	<b>PERSONNEL</b>	<b>OBSERVATIONS</b>
20/04/00	Check Site Notice and facility surrounds	M. Henry & T.O'Mahony	Non Compliant

**(2) Facility Development**

All wastes entering the facility will be inspected at the entrance to the site and in the waste transfer building. The main waste transfer building will be 72m x 46.5m x 11.27m and the contents of skips will be emptied onto the floor and the recyclable fraction (cardboard, glass, wood, plastics, metals, paper) of the waste removed. All waste for landfilling is bulked into an ejector trailer prior to dispatch to landfill. The following items of waste processing plant are proposed: loading shovel vehicles, articulated vehicles, ejector trailers and an industrial baler for cardboard, paper and plastic. The proposed decision requires the applicant to have adequate duty and standby capacity for all items of plant deemed critical for the processing of waste.

The main infrastructure proposed by the applicant include CCTV, weighbridges (2), weighbridge office, wheelwash, truck wash and truck parking/skip storage areas. The proposed decision makes provision for this infrastructure. A 3.0m high wall shall be provided around the perimeter of entire facility while an existing building on the site will be maintained as offices and as a truck servicing area. The proposed decision requires the applicant to remove and decommission the existing septic tank on site. Foul water (including sewage, drainage from waste transfer building, wheelwash etc.) which is generated on site will be collected in an underground tank and tankered to Carrigtwohill Wastewater treatment plant. The consent conditions outlined in Cork County Council's Section 52 response have been included in the proposed decision.

The entire site will be impermeable hardstand, with the exception of some grass and landscaped areas.

**(3) Waste Types and Quantities**

The total quantities and types of wastes to be accepted at the facility are as outlined below.

YEAR	TOTAL QUANTITY OF NON-HAZARDOUS WASTE (tpa)
2000-2001	50,000
2001-2002	62,000
2002-2003	75,000
2003-2004	88,000
2004-2005	95,000
2005-onwards	95,000

**(4) Emissions to Air**

Monitoring requirements and an emission limit for dust deposition ( $350\text{mg/m}^3$ ) are set in order to control any fugitive dust emission from activities on site. The applicant will be required to install dust flaps on doors to the waste transfer building in addition to the maintenance of negative pressure throughout the waste transfer building and the installation of an odour management system. Waste for disposal is required to be stored in sealed covered containers within the transfer building and removed off-site within forty eight hours of its acceptance at the facility.

Noise emission limits are specified in Schedule F of the proposed decision and limits of 45L<sub>eq</sub>dB(A) and 55 L<sub>eq</sub>dB(A) are applied for night time and daytime, respectively. Condition 7 will ensure that there shall be no clearly audible tonal component or impulsive component in the noise emissions from the activity at the noise sensitive locations.

#### **(5) Emissions to Groundwater**

There will be no emissions to groundwater. As stated above, the site will be concreted and all fuel tanks must be banded. The applicant proposed (as part of the EIS) to monitor groundwater at an existing well and a proposed well for the EPA baseline suite of parameters on an annual basis and for the EPA compliance suite of parameters every six months. The proposed decision provides for this monitoring.

#### **(5) Emissions to Surface Waters**

The surface water discharging from the site will pass to a stream to the east of the industrial estate which in turn enters the Butlerstown River approximately 3 km south of the site. The Butlerstown River flows into the Glashaboy River. Surface water discharges from the facility will be required to pass through a silt trap and oil interceptor prior to discharge off-site with the exception of rain water draining to the soak pit at the northern end of the site. This consists primarily of roof water falling on the northern half of the waste transfer building and rainwater running along the northern boundary and northwestern corner of the site. The applicant proposed (in the EIS) to monitor surface water discharges from the site in addition to the stream to which the surface water from the facility discharges and the proposed decision makes provision for this.

#### **(3) Other Significant Environmental Impacts of the Development**

None

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

The Cork Waste Management Plan which was adopted in May 1999 makes reference to the provision of 'a network of solid waste transfer stations in Co. Cork which will allow for the efficient and economic transport of waste'. The proposed development is in line with such provisions.

#### **(16) Submissions**

**Appendix 2 contains a list of all submissions received relating to the application to date. The dates received and the details of the individual, department, group or organisation making the submission are provided.**

**An overview of the submissions received in relation to the waste licence application is provided. This includes a summary of the issues raised in the submissions.**

78 submissions were received in relation to this application and I have had regard to the submissions in making my recommendation to the Board.

#### ***Ground 1: Nuisances***

- *There is a lack of guarantee by the operator of effective pollution control in respect of noise, odours, dust and other nuisances.*
- *The local community and workers in the industrial estate will be subjected to persistent odours, noise levels and nuisances. Increased vermin, flies, insects and birds will result from the proposed development. The quality of life for the local residents will also be affected.*
- *The increased vermin will impact on the indigenous animal population as well as humans.*
- *Will the Agency be on-site all the time to monitor nuisances?*
- *The issue of litter control and the use of netting to cover waste vehicles is questioned in one submission and it asks ‘who will enforce this policy and deal with the deposition of material on approach roads?’*
- *The statement in the EIS that any putrescible waste which inadvertently arrives on site will be processed in a very short time is in conflict with the stated policy that this material will be refused in the first place.*
- *No evidence is provided to show that decomposition gases will be minimal and a complaints record for odour and air quality (Section 3.4.6 of EIS) is not a satisfactory mitigation measure.*
- *What measures will be put in place if the noise levels predicted in the EIS are exceeded?*

#### **Comment**

Potential nuisances are controlled by Condition 6 of the proposed decision. Compliance with the conditions of the proposed decision will ensure that no environmental pollution will arise from the licensed activities. The onus is on the applicant to be in compliance with the proposed decision at all times and this will be verified by the submission of reports/results required and regular site visits by Agency staff. If the applicant is found to breach any condition, then the Agency will take the necessary enforcement action. Condition 1.5 of the proposed decision prohibits the acceptance of waste loads consisting primarily of putrescible matter and the proposed decision also requires the applicant to maintain negative pressure within the waste transfer building in addition to the installation of an odour management system.

#### **Ground 2: Leachate storage, containment and treatment, surface water**

- *All ‘wastes’ and rain water should be collected and treated in an aeration wastewater plant prior to discharging to the public mains sewer.*
- *There is no guarantee that the local water courses will not become contaminated and, the Glashaboy River, which is the main water source for many estates in the area will be polluted.*
- *Details on how the leachate will be collected, treated and contained to ensure protection of local drinking water supplies should be supplied. In addition, there is no guarantee that the waste water will be collected from the on-site storage tanks.*
- *There is no mention of online monitoring of site runoff (e.g. pH, COD) and is it still proposed to control surface water with a ‘feeble regime’ of off-site grab sampling? This is inappropriate in light of the run-off leading into the Glashaboy River.*
- *The run-off from trucks (which are awaiting sorting) will enter the stream that flows at the back of the plant.*

### **Comment**

Details on the collection and containment of foul water were submitted in the waste licence application/EIS. The proposed decision requires all sewage and foul water from the facility to be collected in dedicated underground tanks prior to tankering off-site for treatment in the local authority wastewater treatment plant. The applicant will be required to tanker the foul water from the facility on a regular basis to ensure that the on-site tanks have adequate capacity. All surface water (with the exception of rain water draining to a soak pit at the northern end of the site) is required to pass through a silt trap and oil interceptor prior to its discharge off-site and a shut-off valve will also be installed on the surface water discharge lines. The entire site will be impermeable hardstand, with the exception of some grass and landscaped areas and this will ensure that no impact on groundwater supplies will result. The applicant is required to comply with emission limit values for surface water discharges and this will ensure surface water emissions from the facility will have no significant environmental impact. It is considered that the monitoring specified in the proposed decision is adequate for the control of all emissions from this facility.

### **Ground 3: Traffic**

- *This development will result in undesirable levels of traffic on routes which are unsuitable for traffic. The traffic on the road network has increased over time and it has had a detrimental effect on the local roads and the use of these roads by the local community.*
- *The waste vehicles will generate unacceptable levels of noise, dust, fumes, odours, litter and other nuisances and will generally undermine the local environment, disrupt traffic flow, impact on the flora/fauna along the roads, impact on the businesses in the industrial estate and damage the local road network.*
- *The routes which traffic will take to the Industrial estate have not been addressed in the EIS.*
- *The extent of the increase in traffic caused directly by the development should be examined in detail and the conclusion that the predicted increase in traffic will not cause any significant increase in noise levels is seriously questionable.*
- *The number and frequency of vehicles transporting recycled materials from the site have not been considered in the traffic surveys.*
- *The facility should not be located on a site which is badly served by access roads.*
- *The scope of the EPA should be broadened to include the issue of traffic.*

### **Comment**

Details on traffic were included in the EIS for the proposed development. The issue of traffic is outside the scope of the proposed decision and is a matter for the roads authority.

### **Ground 4: Groundwater pollution/ threat to groundwater supplies/animal disease**

- *The facility will result in increased levels of groundwater pollution and animal disease in an agricultural area and will be a risk to groundwater wells in the area*
- *The entire site (which floods in wintertime) should be concreted with two screed layers and an impervious liner in between. There are no assurances that wastewater will not pollute aquifers and individual well supplies in the locality.*

### **Comment**

The entire site will be impermeable hardstand, with the exception of some grass and landscaped areas. All hardstanding will be constructed to British Standard 8110 and this will ensure the adequate protection of groundwater. Compliance with the conditions attached to the proposed decision will ensure that this facility will have no impact on animal health or groundwater supplies.

***Ground 5: Illegal dumping/Litter***

- *The facility will increase litter and illegal dumping at the entrance to the facility and in the immediate vicinity of the proposed development with a resulting high risk of pollution.*
- *There is no guarantee that site security will prevent the public from dumping domestic waste at the site as is the case with similar operations.*
- *Will CCTV be used to prevent dumping by the general public at the entrance to the site? CCTV has not proved to be a deterrent in other areas.*

**Comment**

The proposed decision requires the applicant to install CCTV at the facility and at the entrance to the industrial estate and this will be used as a means to prevent illegal dumping taking place. All vehicles delivering waste to and removing waste and materials from the facility are required to be appropriately covered, fully enclosed and adequately secured to prevent spillage. In addition, litter which has accumulated within the facility and its environs is required to be removed on a daily basis (Condition 6.5).

***Ground 6: Proposed location and Planning issues***

- *The proposed location for the facility is a few hundred yards from St. Stephens Hospital and will impact on residential areas (heavily populated) and local schools/amenities (pitch and putt, local wood).*
- *As the industrial estate contains totally unrelated businesses, the location is incompatible and it cannot sustain a private enterprise of this nature. The proposed development would be more suitably situated near existing Local Authority waste disposal sites.*
- *Reference is also made to the inability of local residents and a separate proposed development for the estate to obtain planning permission because of the local road network being too busy and the lack of infrastructure.*
- *The proposed development may have serious consequences for the viability of established local firms in the industrial estate which includes a food products store.*
- *Granting planning permission will cause further problems and 'Aherns' have stated that they are willing to accept an incinerator beside the proposed facility. BSE carcasses will be transported to the facility and this will cause uproar in the local community.*

**Comment**

The issues of planning raised here are outside the scope of the proposed decision and are a matter for the planning authority. The proposed decision will ensure that the facility will not impact significantly on the environment. No proposal for an incinerator has been received and a new application would be required for such a facility. Animal wastes are prohibited from being accepted at the facility.

**Ground 7: Waste management/acceptance**

- *There is no guarantee that the upper limit of 95,000 tonnes will not be exceeded and the question of ‘Who is going to police this?’ was asked.*
- *There is no certainty that skip waste will not contain organic, toxic, corrosive and other hazardous materials and there is concern that the applicant will not continuously monitor the type of wastes being deposited in their skips. Also the public may add hazardous waste to skips parked at the site.*
- *Waste inspections: The submissions also state that the inspection of wastes at the entrance to the facility is very unlikely to result in waste which is deemed unacceptable being refused entry.*
- *Clarification is sought on (i) the basis for the EIS statement that ~25% of the waste conveyed to the site will be recycled and (ii) the statement that waste loads with a low percentage of recycleables will be sent to landfill while those with a high percentage will be processed at the transfer station.*
- *The applicants assertion that the plant will be designed and operated to the highest standards is nonsense and the locals question what is meant by highest standard. This company’s record is extremely suspect to date and the past operations history of the applicant is far removed for the ‘highest operational standards’.*
- *No proper study of where the waste arises and where it is to be sent for recycling has been carried out.*
- *The use of estimated quantities of wastes to be accepted at the facility in the EIS is questionable and clarification is sought on what constitutes non-infectious health care waste.*
- *In the event of a breakdown of equipment on-site the skips should be diverted to landfill until replacements/repairs have been carried out.*

**Comment**

The proposed decision prohibits the acceptance of hazardous waste at the facility and the applicant will be required to develop and implement detailed waste acceptance procedures to ensure that only those wastes deemed acceptable are taken in at the facility. In addition, all new customers will be subject to waste profiling and characterisation off-site. A waste inspection/quarantine area will be provided at the waste transfer building and only after each load of waste is inspected shall the waste be processed for disposal or recovery.

The proposed decision provides for the acceptance of a maximum of 95,000 tonnes per annum at the facility (as the site is not in operation these were estimated by the applicant). The Agency through its enforcement powers (site inspections, audits etc.) will assess compliance with this tonnage restriction. The applicant proposed to recycle 25% of all waste accepted at the facility and the proposed decision provides for this while the means by which the targets in ‘Changing Our Ways’ is required to be submitted to the Agency for its agreement under Condition 5.7.

The proposed decision will also ensure that adequate waste handling capacity will be provided on site and environmental emissions from the facility will be adequately monitored and controlled. Condition 10.6 of the proposed decision requires the diversion of all waste away from the transfer station in the event of a complete breakdown of equipment or any occurrence which results in the closure of the transfer station building. All facilities which accept waste from the proposed development must have the prior agreement of the Agency. The applicant has not been prosecuted to date under the Waste Management Act 1996.

**Ground 8: Fire & Emergencies**

- *A fire water retention facility should be insisted upon by the EPA as well as an automatic diversion of firewater to the pond in the event of a fire incident.*
- *Concerns were also expressed on fire safety and what evacuation plans will be put in place for local residents and patients in the nearby hospital in the event of a fire or explosion.*

**Comment**

Condition 10.5 of the proposed decision requires the applicant to undertake a firewater risk assessment to determine whether the licensee should have a firewater retention facility at the site. In addition, an emergency response procedure is required to be developed under Condition 10.1 of the proposed decision and this will address any emergency situation which may arise at the facility.

**Ground 9: Health**

- *The health of the people and future generations will be affected and should be protected.*

**Comment**

It is considered that compliance with the conditions attached to the proposed decision will ensure that this facility will have no significant impact on human health or the local environment.

**Ground 10: Visual**

- *The proposed development will obstruct the views of local residents and will be an 'eye soar'*
- *Clarification is also sought on the visual screening to be used and how the mitigation measure proposed will be implemented.*

**Comment**

The facility will be situated in an existing industrial estate and this, together with the mitigation measures proposed (3m high perimeter wall, provision of screen planting inside perimeter wall) by the applicant, will ensure that a significant negative visual impact will not result from the proposed development. In addition, a revised landscaping programme is required to be submitted to the Agency for its agreement under Condition 4.21 of the proposed decision.

**Ground 11: Lifespan**

- *The estimated duration of the operational phase and the decommissioning phase of the project should be provided.*

**Comment**

The proposed decision requires the applicant to agree a decommissioning and aftercare plan with the Agency (Condition 8.1).

**Ground 12: Communication**

- *Communication between the applicant and local people has been very poor and the first time most residents heard about this proposal was on the local paper. The applicant refused to meet the residents in the local community hall and has not informed the local community of some issues (e.g. feedback from well water survey).*



*Hence, the locals are suspicious that the development will not take place in an proper and orderly manner.*

**Comment**

The information submitted with the waste licence application and EIS is available for public viewing at the Agency's offices and also at the offices of the local authority. The proposed decision requires the applicant to prepare a communications programme to allow members of the public to obtain information regarding the environmental performance of the applicant. Compliance with the conditions of the proposed decision will ensure that the proposed development will have no significant environmental impact.

Signed \_\_\_\_\_

Dated:

Dr. Michael Henry  
Inspector, Environmental Management & Planning

**APPENDIX 1**  
**LOCATION MAP & LAYOUT PLAN**