

MEMO			
TO:	Board of Directors	FROM:	Michael Henry
CC:		DATE:	16 th July 2003
SUBJECT: Mulleady's Ltd. Objection to Proposed Decision – Reg. No. 169-1			

Application Details	
Applicant:	Mulleady's Ltd.
Location of Activity:	Mulleady's Ltd., Cloonagh, Drumlish, Co. Longford
Reg. No.:	169-1
Objection received (one):	23/06/03
Submission on objection received:	N/A
Proposed Decision issued on:	26/05/03
Inspector:	Mr. Kealan Reynolds

Consideration of the Objection.

One objection was received from Mr. Anthony Mulleady (Managing Director), Mulleady's Ltd., Waste Management Division, Cloonagh, Drumlish, Co Longford. The Technical Committee (Michael Henry, Chairperson, Caoimhin Nolan and John Gibbons, committee members) has considered all of the issues raised and this report details the Committee's comments and recommendations following the examination of the objection.

OBJECTION No 1:

GROUND 1:

The definition of Biodegradable Waste should be extended to include the words: 'and any other waste classified as biodegradable'.

Technical Committee's Evaluation

The definition of 'Biodegradable Waste' included in the PD is the definition listed in the Landfill Directive (1999/31/EC) and also in the EU Working Document on the 'Biological Treatment of Biowaste' (2nd Draft). The technical committee recommends no change to the definition specified in the PD.

Recommendation

No change

GROUND 2

Condition 1.2 of the PD refers to Drawing No. C.1.1. of the application and the boundary line on this map is incorrect. Map C.9.1 and the Ordnance Survey Map B 2.2 which were submitted as part of the application contain the correct site boundary for the facility.

Technical Committee's Evaluation

The technical committee notes the applicants comments in relation to the facility boundary as specified in Condition 1.2 of the PD. It is recommended that Condition 1.2 is amended to refer to the correct facility boundary.

Recommendation

Amend Condition 1.2 as follows:

For the purposes of this licence, the facility is the area of land outlined in orange on Drawing entitled 'Land Registry, Longford 1:250, O.S. 4/16, 8/4' which was received by the Agency on 21/12/01. Any reference in this licence to 'facility' shall mean the area thus outlined in orange.
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GROUND 3

The time limit for submission of Specified Engineering Works proposals to the Agency (i.e. 2 months prior to the intended date of commencement of such works) should be shortened.

Technical Committee's Evaluation

Condition 3.2.1 requires the submission of SEW proposals to the Agency at least 2 months prior to the intended date of commencement of such works and this is intended to allow the Agency adequate time for it to assess the information. However, taking into account the nature and scale of activities which will take place at this facility, the technical committee consider that the timeframe should be reduced from 2 months to 1 month.

Recommendation

Amend Condition 3.2.1 as follows:

The licensee shall submit proposals for all Specified Engineering Works, as defined in *Schedule B: Specified Engineering Works*, of this licence to the Agency for its agreement at least **one month** prior to its intended date of commencement of any such works. No such works shall be carried out without the prior agreement of the Agency.

GROUND 4

The washing of the waste transfer station floor and waste handling/process equipment on a daily basis appears very excessive and would generate a lot of waste water. The applicant seeks to amend this to a monthly wash down of the waste handling and process plant.

Technical Committee's Evaluation

Condition 4.3.1 requires the floor of the waste transfer building and all waste handling/processing plant to be cleared of waste and washed down on a daily basis. This is necessary to ensure that all loose waste/litter is prevented from accumulating in the transfer building and also to minimise odour problems arising.

Recommendation

No change

GROUND 5

Condition 4.4.1 should be amended to allow soil to be used (if in the future it becomes a proven and acceptable technology) as a beneficial and environmentally acceptable form of treating biodegradable waste.

Technical Committee's Evaluation

The applicant proposed (as part of the waste licence application) to use soil as a medium for the treatment of organic wastes and trials were carried out at the facility. The applicant placed a layer of soil on a concrete slab and mixed the organic waste with the soil and claimed that the soil would breakdown the waste. The results of the trials showed that the waste had not been suitably stabilised (as evident by the elevated BOD (4,440mg/l) and Ammonia (70.2mg/l) levels in run-off from the 'treated' waste). The technical committee considers that there are a number of other proven and acceptable forms of biodegradable waste treatment available today and include fully enclosed aerated composting (also proposed by the applicant in the application). Details on this will have to be agreed with the Agency under Specified Engineering Works (Schedule B).

Recommendation

No change

GROUND 6

The annual tonnage allowed for composting should be increased from 10,000 to 20,000 on the basis that the odour assessment carried out by Odour Monitoring Ireland suggested that, with proper abatement measures, the facility could handle the increased tonnage.

Technical Committee's Evaluation

The technical committee notes that the applicant did not specifically request a particular tonnage of waste to be accepted at the facility for composting as part of the licence application. The Odour modelling report submitted as part of the licence application examined the expected impact of odours

resulting from the composting of waste under a number of scenarios (e.g. different tonnages, different odour concentrations and with/without the use of abatement technologies). This report concluded that with the use of abatement technology, composting waste of 15,000 tpa and 20,000 tpa would result in an odour nuisance to nearby residential properties, whereas composting waste at up to 10,000 tpa would not cause such a nuisance. The technical committee consider that the tonnage of waste to be accepted for composting in the PD should not be changed.

Recommendation

No change

GROUND'S 7 AND 8

Condition 5.4.1 should be amended to refer to SD1 as the monitoring point and not SW1 as stated in the Proposed Decision. Likewise Condition 5.4.2 should be amended to reflect this change.

Technical Committee's Evaluation

The technical committee notes the typographical error in the above conditions and recommends that they be amended to refer to SD1.

Recommendation

Amend Conditions 5.4.1 and 5.4.2 by replacing SW1 with SD1.

GROUND 9

The objector wants the Agency to confirm the distance in metres that litter and debris needs to be collected on the road network in the vicinity of the facility.

Technical Committee's Evaluation

Condition 6.2 of the PD requires the licensee to keep the road network in the vicinity of the facility and all facility roads and surfaces free from debris caused by vehicles entering or leaving the facility. This will require the licensee to put in place procedures to ensure that debris is not transferred onto public roads outside the facility. The success or otherwise of such procedures will govern how much time the licensee should devote to this.

Recommendation

No change

GROUND 10

The objector seeks to change the wording of Condition 6.4.2 to include 'within the boundary of the facility'.

Technical Committee's Evaluation

Condition 6.4.2 of the PD requires the licensee to ensure that, during dry weather, site roads and any other areas used by vehicles shall be sprayed with water to minimise airborne dust. This condition also applies to public roads in the vicinity of the facility and regularly spraying with water will minimise dust nuisance arising from vehicles entering/leaving the facility.

Recommendation

No change

GROUND 11

The objector seeks to clarify if Table C.3 (Surface Water Discharge Limits) refers to sampling point SD1 and if so, then SD1 should be referenced here.

Technical Committee's Evaluation

The technical committee concur with the applicants comments above and recommend that Table C.3 is amended to specifically refer to SD1.

Recommendation

Amend Table C.3 heading as follows:

Surface Water Discharge Limits: (Measured at the monitoring point SD1 indicated in Table D.1.1)

Signed: _____
Michael Henry

Technical Committee Chairperson