OFFICE OF LICENSING & GUIDANCE

INSPECTORS REPORT ON A LICENCE APPLICATION

TO:	Directors
FROM:	Pernille Hermansen **- Licensing Unit**
DATE:	22 April 2004
RE:	Application for a Waste Licence from Greenstar Materials Recovery Ltd., Licence Register 188-1.

Application Details	
Type of facility:	Waste Transfer Station
Class(es) of Activity (**P** = principal activity):	3rd Schedule: Classes 11, 12 and 13 4th Schedule: Classes 2 (**P**), 3, 4, 12 and 13
Quantity of waste managed per annum:	95,000 tonnes
Classes of Waste:	Household waste, construction & demolition waste, commercial & industrial wastes.
Location of facility:	Site 14B, Phase 3, Road 3A, Greenogue Industrial Estate, Rathcoole, Co. Dublin,
Licence application received:	25/06/03
Third Party submissions:	One
EIS Required:	Yes
Article 14 Notices sent:	10/09/03
Article 14 compliance date:	30/10/03
Article 16 Notices sent:	10/09/03
Article 16 Compliance date:	16/03/04
Site Inspection:	21/07/03 Site Notice Inspection by O. Cunningham. Site notice compliant.

1. Facility

Greenstar Materials Recovery Ltd. (Greenstar) has applied for a waste licence for a new development comprising of a waste transfer station at Greenogue Industrial Estate, Rathcoole, Co. Dublin. The site was acquired from Burns Waste Recycling Ltd by Greenstar Recycling Holdings Ltd through it's wholly owned subsidiary Murphy Waste Ltd in 2002.

A planning permission was granted by South Dublin County Council (SDCC) in July 2002 for the development of the site with a condition attached stipulating that the annual intake of waste should not exceed 25,000 tonnes. The applicant has applied for a new planning permission allowing for an increase in the volumes of waste accepted at the site from 25,000 tonnes to 95,000 tonnes per annum as well as changes to various infrastructure at the site. Operations commenced at the facility in November, 2003 under the existing planning permission and a waste permit issued by SDCC.

The facility occupies a leased area of 0.603 ha in the north of the Industrial Estate. The facility is bounded by business units on the south and west and on the north and east by the perimeter fence of the Industrial Estate. The land on the northern and eastern side outside the perimeter fence is agricultural land used for tillage. The closest residential dwelling is about 350 m northwest of the facility. A surface water course which is a tributary of River Griffeen runs along the northern boundary of the facility. Casement Aerodrome is located about 0.5 km north of the site.

Classes 11, 12 and 13 of the Third Schedule and Classes 2, 3, 4, 12 and 13 of the Fourth Schedule were applied for in the application. Class 2 of the Fourth Schedule is the principal activity. The applicant applied for Class 11 of the Fourth Schedule but has since decided not to proceed with this activity at the facility as stated in the Art. 14 reply submitted 9/10/03.

The applicant has proposed the following hours for waste processing (detailed in the EIS) and waste acceptance (detailed in the Art 16 reply submitted 15/12/03).

	Hours of Waste Processing	Hours of Waste Acceptance
Monday to Friday	7:30-19:30	6:30-20:30
Saturday	9:00-15:00	7:00-16:00

The recommended PD requires that waste is only accepted at the facility when waste processing will be carried out to ensure that large amounts of un-processed waste will not be stored at the facility overnight. The PD (Condition 1.7) sets the following hours for waste acceptance:

	Hours of Operation	Hours of Waste Acceptance
Monday to Friday	6:30 – 20:30	7:30-19:30
Saturday	7:00 – 16:00	9:00-15:00

Facility Development

The installation of infrastructure at the facility is controlled by Condition 3 of the recommended PD.

The PD requires that an impermeable concrete surface shall be installed in all areas of the facility (Condition 3.5).

Other main infrastructure proposed by the applicant and required by the recommended PD includes security fencing and installation of a waste quarantine area, two weighbridges, a vehicle wash area as well as installation of wastewater and surface water run-off drainage network including silt traps and oil interceptors.

2. Operational Description

The applicant proposes to accept 95,000 tonnes per annum. The PD allows the facility to accept up to 95,000 tonnes per annum consisting of household waste (15,000 tonnes), commercial waste (37,500 tonnes), industrial waste (37,500 tonnes) and C&D waste (5000 tonnes) detailed in Schedule A. The annual tonnages of the various waste types can be changed with the agreement of the Agency as long as the total annual tonnage remains the same.

All waste will be tipped and processed inside the waste transfer building (Condition 5). The applicant proposes to install two balers, one shredder, one trommel and a picking line. Dry recyclable waste will be segregated at the facility by use of the plant mentioned above and some waste types such as paper, cardboard and aluminium cans will be baled/compacted prior to recovery off-site. Residual putrescible waste will be transferred for disposal off-site. Municipal solid waste that has not been source segregated will be baled at the facility prior to disposal off-site.

The applicant proposes to store baled cardboard and plastics, waste glass, timber, concrete/brick and soils out-doors in a designated waste container area. The recommend PD requires that only non-putrescible waste can be stored in the designated waste container area in covered and sealed containers with drainage to the wastewater drainage system (Condition 7.4). Putrescible waste shall be stored inside the waste transfer building and be removed within forty eight hours (seventy two hours on weekends) (Condition 7.4).

The applicant has submitted procedures for the acceptance and handling of waste that apply to any Greenstar locations other than landfill. The PD requires that detailed and site specific procedures in relation to waste acceptance and handling be submitted to the Agency within six months of the date of grant of this licence (Condition 5.2).

3. Use of Resources

The facility has included details on raw material and energy consumption as follows: Diesel Oil 15,000 l, Electricity 40,000 kW, Water 100,000 l, which are within the expected consumption for this type of facility.

4. Emissions

4.1 Emissions to Air

Odour

Condition 7.4 of the PD requires removal of all putrescible waste for disposal within forty-eight hours of its arrival (for Bank Holiday weekends seventy two hours) to avoid odour nuisances. To control any possible odour nuisances from putrescible waste accepted at the facility, all putrescible waste shall be stored inside the transfer station building in suitable covered and enclosed containers. Only dry recyclable waste (non-putrescible) can be stored out-doors in suitably covered and enclosed containers in the designated waste container area. Furthermore the floor area(s) of the waste transfer building where putrescible municipal solid waste is accepted/handled shall be cleared and washed down daily. The storage bays inside the waste transfer building shall be washed down and cleaned when the bays are emptied The remaining floor area of the waste transfer building shall be washed down and cleaned as needed (Condition 5.3).

4.2 Emissions to Sewer:

The applicant proposes to discharge the wastewater from the vehicle wash area and the floor wash as well as sanitary wastewater to the sewer. The recommended PD allows for this and in addition the surface water run-off from any waste storage/handling area(s) including the surface water run-off from the weighbridge shall be discharged to sewer (Condition 3.11). The discharge to sewer (excluding sanitary wastewater) shall be discharged via a silt trap and oil interceptor. Condition 3.11 of the recommended PD specifies that the oil interceptor for discharge to sewer shall be a Class I full retention interceptor as proposed by the applicant.

A Section 52 consent has been obtained from Kildare County Council. Condition 6.6 sets the requirements for emission to sewer with additional general consent conditions requested by SDCC. The recommended PD requires wastewater (excluding sanitary wastewater) to be monitored. Monitoring requirements are set under Condition 8 and Schedule D. Emission limit values are set under Schedule C.

4.3 Emissions to Surface Waters:

The applicant proposes to discharge the surface water run-off from the facility via the surface water run-off drainage system serving the industrial estate to a stream which is a tributary to the River Griffeen. The River Griffeen is a tributary of the River Liffey. According to the Greenogue Industrial Park EIS Flora and Fauna Report submitted as part of this application, the River Griffeen contains stocks of brown trout and in the lower reaches, near the Liffey it holds sea trout. Surface water monitoring carried out by the applicant at two locations on the stream shows high levels of Ammoniacal Nitrogen (1.6 mg/l) at the up-stream location and high levels of Nitrate at both locations (down-stream 39.0 mg/l and up-stream 33.7 mg/l). The applicant states that the surface water monitoring results from the stream are indicative of possible contamination from agricultural sources.

The proposed surface water run-off drainage system incorporates a flow attenuation tank which comprises a large concrete underground tank with a capacity of 282 m^2. The attenuation tank provides temporary storage of surface water from which it will be discharged at a steady rate (5.5 l/s) to the surface water run-off drainage system

serving the industrial estate as required in the SDCC planning permission granted for the facility.

The applicant proposes to discharge all surface water run-off from roof buildings, parking areas, areas with vehicle movement, the weighbridge and skip storage area to the surface water sewer drainage system. Condition 3.11 of the recommended PD requires that surface water run-off from the areas described above shall be discharged to the surface water run-off drainage system excluding the surface water run-off from the weighbridge. The surface water run-off from any area(s) with waste storage/handling including the weighbridge shall be discharged to the wastewater drainage system. All the surface water run-off shall be discharged via a silt trap and a Class I full retention interceptor. The applicant states that the petrol/oil interceptor serving the attenuation tank will be relocated downstream of the outfall from the tank in compliance with SDCC. The applicant states that the drainage channels will be provided with silt traps before the connection point to the attenuation tank. The PD requires that the applicant shall install and maintain silt traps and a Class I full retention oil interceptor prior to discharge to surface water (Condition 3.11)

The PD requires that surface water monitoring is carried out at the discharge point to the surface water run-off drainage system (Schedule D). The applicant proposes to monitor for the following parameters: Total Nitrogen, Total Ammonia, Biochemical Oxygen Demand, Chemical Oxygen Demand, Electrical Conductivity, pH and Temperature. The recommended PD allows for this and requires the following additional parameters to be monitored: Suspended Solids and Mineral Oils. Surface water monitoring requirements are established under Schedule D. Emission limit values are set under Schedule C. Condition 6.3 of the PD set trigger levels for surface water discharges from the facility.

4.4 Emissions to ground/groundwater:

The applicant states that the underlying rock consists of calp limestone rocks. The soil type at the facility is classified as boulder clay. The facility is located over a Locally Important Aquifer that is productive only in local zones that has an extreme vulnerability status. The applicant states that the aquifer beneath the site is not used locally as a source of groundwater supply.

The recommended PD requires that all areas of the facility shall be impermeable concrete surfaces (Condition 3.5). The proposed fuel storage area shall be bunded as per Condition 3.10 of the PD. Condition 6.4 of the PD specifies that there shall be no direct emission to groundwater.

4.5 Noise:

The applicant has submitted results from a baseline noise survey. The noise monitoring survey was carried out in the vicinity of three noise sensitive locations in relation to this facility. The monitoring was carried out during the daytime on a cyclical basis for a three hour period and each sample period was 15 minutes long. The applicant states that the survey found the noise levels to be relatively high. At position 1, the recorded noise levels were 70, 54 and 54 dB L_{Aeq}. At position 2, the recorded noise levels were 61, 63 and 63 dB L_{Aeq}. At position 3, two monitoring

samples were recorded both with a recorded noise level of 65 dB L_{Aeq}. The noise environment was dominated by noise from road traffic.

Condition 8 and Schedule D set the requirements for noise monitoring. The noise emission limit values to be measured at any noise sensitive location are set in Schedule C.

4.6 Nuisance:

Potential nuisances at the facility are controlled by Condition 7 of the PD.

Dust

Dust monitoring results submitted by the applicant show that the dust deposition level exceeded the emission limit values set by the Agency at one of the four proposed monitoring locations. The recommended PD requires that dust monitoring is carried out three times a year (Condition 8 and Schedule D). Dust emission limit values are set out in Schedule C. Condition 7.4 of the recommended PD ensures the dust control measures are carried out.

5. Visual Impact

The applicant states that the site is visible from one residential property located approximately 350m to the northwest. The impact on this property is however considered to be negligible. The facility will be indistinguishable from the other industrial units on the adjoining lands and further development on currently vacant lots to the west of the facility will compound this effect. The applicant considers the visual impact of the facility to be insignificant by the applicant given the existing developed character of the surrounding landscape.

6. Cultural Heritage, Habitats & Protected Species

The applicant details that the site is not covered by any designations for conservation. According to the applicant there are four designated conservation areas within a ten kilometres radius of the site (3 pNHA and 1 cSAC). The applicant states that none of these designated areas will be affected by the proposed development.

7. Waste Management, Air Quality and Water Quality Management Plans

The plans for the region have been considered during the assessment of this application for a waste licence.

The applicant states that the Dublin Waste Management Plan emphasises the need to divert waste from landfill and identifies the lack of recycling and disposal infrastructure in the short to medium, as well as long term, as one of the main practical problems facing the local authorities in the Greater Dublin Area. According

to the applicant the proposed facility will form a key element of the required recycling infrastructure thus reducing reliance on scarce landfill capacity in the Greater Dublin Area.

8. Environmental Impact Statement

The EIS was assessed in so far as the environmental pollution from the operation of the facility and found to be in compliance with Article 25 of the EIA Regulations.

9. Compliance with Directives/Regulations

The facility does not fall under the scope of the Landfill Directive or the IPPC Directive. In relation to the Groundwater Directive, the facility will not have any direct emission to groundwater.

10. Fit & Proper Person Assessment

The applicant Greenstar Materials Recovery Ltd is a fully owned subsidiary of Greenstar Recycling Holdings Ltd. (formerly Celtic Waste Ltd). The applicant has provided audited accounts for 2000 and 2001 for the company Celtic Waste Ltd, showing a profit for both years.

The applicant submitted an Environmental Liabilities Risk Assessment (ELRA) stating that there are no current environmental liabilities and any future liabilities are likely to be associated with incidents whose impact is not possible to predict at this time. According to the applicant it is therefore not possible to realistically quantify the costs associated with addressing any particular future environmental liabilities. The applicant states that it will have adequate insurance cover for environmental liabilities to the sum of €6,350,000 for any occurrence, which will apply to "sudden identifiable and unintended incidents". This liability will be provided by a €2,000,000 fund that covers environmental damage caused by Greenstar Materials Recovery Ltd. The provision of this fund is shown in the audited accounts for 2000.

The PD requires that an independent third party risk assessment of the facility is carried out (Condition 12.2). The risk assessment shall include a comprehensive and fully costed ELRA for the facility together with a proposal for financial provisions arising from the carrying on of the activities to which this licence relates including the restoration of the facility.

11. Submissions

There was one submission made in relation to this application.

Submission from Ms Gretta Hannigan, Senior Fisheries Environmental Officer, The Eastern Regional Fisheries Board, 15a Main Street, Blackrock, Co. Dublin

In the submission dated 6/02/04 Ms Hannigan makes 4 points as detailed below.

(i) *Ms Hannigan points out that the River Griffeen is salmonid and therefore all surface water should be treated via a petrol/oil interceptor which should be subject to regular inspection and maintenance to ensure efficient use.*

Comment: Condition 3.11 of the PD requires that all discharges to surface water shall be discharged via a Class I Full retention interceptor. Condition 3.11 requires that the silt traps and oil interceptors shall be inspected weekly, desludged as necessary and properly maintained at all times.

(ii) *Ms Hannigan states that wastewater from the vehicle wash area, floor washdown from the transfer building etc., shall be discharged to the foul sewer.*

Comment: Condition 3.11 of the PD requires that wastewater from the above mentioned sources shall be discharged to the wastewater drainage system.

(iii) *Ms Hannigan recommends that daily visual inspection be carried out at the surface water monitoring location.*

Comment: Schedule D.4 of the PD requires that a daily visual inspection is carried out at the surface water monitoring location SW-1.

(iv) *Ms Hannigan states that the surface water monitoring schedule should include suspended solid determination.*

Comment: Schedule D.4 of the PD requires that the parameter suspended solids is monitored at the facility as part of the quarterly monitoring survey.

12. Charges

The recommended PD requires that the applicant shall pay an annual contribution of €13,446.00 towards the cost of monitoring the activity or otherwise in performing any functions in relation to the activity as the Agency considers necessary for the performance of its functions under the WMA, 1996-2003 (Condition 12.1).

13. Recommendation

I recommend that a licence be granted subject to the conditions set out in the attached PD and for the reasons as drafted.

In making the recommendation for a waste licence I have taken into account all information submitted as part of the application including the Environmental Impact Statement and the submission.

I am satisfied, on the basis of the information available, that the waste activity, or activities, licensed hereunder will comply with the requirements of Section 40(4) of the Waste Management Acts, 1996-2003.

Signed:- Dated:-

Pernille Hermansen
Inspector
Office of Licensing & Guidance

Procedural Note

In the event that no objections are received to the Proposed Decision on the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996-2003.