



**OFFICE OF  
LICENSING &  
GUIDANCE**

**REPORT OF THE TECHNICAL COMMITTEE ON  
OBJECTIONS TO LICENCE CONDITIONS**

<b>TO:</b>	Directors	
<b>FROM:</b>	Technical Committee	<b>- LICENSING UNIT</b>
<b>DATE:</b>	22 July 2004	
<b>RE:</b>	<b>OBJECTION TO PROPOSED DECISION FOR GREENSTAR MATERIALS RECOVERY LTD. WASTE Reg. No. 188-1</b>  Site 14B, Phase 3, Road 3A, Greenogue Industrial Estate, Rathcoole, Co. Dublin.	

Application Details	
Class(s) of activity:	Third Schedule of Waste Management Acts 1996-2003: Class 11, 12, 13. Fourth Schedule of the Waste Management Acts 1996-2003: Class 2,3,4,12, 13.
Location of activity:	Site14B, Phase 3, Road 3A, Greenogue Industrial Estate, Rathcoole, Co. Dublin.
Licence application received:	25/06/03
PD issued:	05/05/04
First party objection received:	31/05/04
Third Party Objection received	None

**Company**

This report relates to an application by Greenstar Materials Recovery Ltd. for a Waste Licence. The application relates to a new waste transfer station at Greenogue Industrial Estate, Rathcoole, Co. Dublin. Class 2 of the Fourth Schedule is the principal activity.

The facility will accept the following non-hazardous wastes: household waste, commercial and industrial waste, construction and demolition waste. The maximum quantity of waste to be accepted is 95,000 tonnes per annum. 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 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.

One submission (The Eastern Regional Fisheries Board) was received in relation to the application and this was considered by the Board at PD stage.

### **Consideration of the Objection**

The Technical Committee, comprising of Malcolm Doak (Chair), Karen Creed and Breen Higgins (committee members), has considered all of the issues raised in the Objection, and this report details the Committee's comments and recommendations following the examination of the objection on this facility.

This report considers the one valid first party objection as set out below. The TC also notes one typographical error which should be corrected; this is addressed at the end of this report\*\*.

## **First Party Objection**

The objection consists of a single two page letter (dated 26 May 2004) addressed to the Agency. The TC will address the objection as points 1 to 3.

### **1**

#### **Condition 1.7.1, 1.7.2 and 1.7.3**

*Greenstar Materials Recovery Ltd, are requesting that conditions 1.7.1, 1.7.2, and 1.7.3 conclude with the statement "unless otherwise agreed with the Agency". The applicant seeks this amendment to these conditions to provide for possible changes in operational circumstances, which, may arise on a temporary or permanent basis at some point in the future.*

#### **Technical Committee's Evaluation**

The Proposed Decision (PD) set the following hours for waste acceptance:

<b>PD Hours</b>	Hours of Operation	Hours of Waste Acceptance
Monday to Friday	6:30 – 20:30	7:00-19:30
Saturday	7:00 – 16:00	8:00-15:00

The quantity of waste is 95,000T/annum for which an EIS was required. The objection is seeking contingency on the hours in order to provide for possible operational reasons. The EIS proposed the following hours for waste processing (detailed in the EIS) and waste acceptance (detailed in the Art 16 reply submitted 15/12/03):

<b>EIS Hours</b>	Hours of Operation	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 operational hours set out in the PD have allowed the applicant more margin than what was originally applied for. Issues in the EIS such as noise and dust would have been written for the hours applied for. Waste acceptance hours are normally set by the Agency within the timeframe for operation so that the facility has a period to cleanup/wind-down. The TC is unable to accept the applicant's proposal for contingency with regard to hours since the EIS would need to be re-written by the applicant. Furthermore the Office of Environmental Enforcement cannot be expected to regulate requests on hours of operation for a facility without regard to the EIS.

***Recommendation***

No Change

**2**

**Condition 5.3.1**

*Greenstar Materials Recovery Ltd consider that the requirement to wash down the floor area each day would be an unnecessary waste of both of their resources and those of Dublin City Council at their municipal wastewater treatment works. They request that condition 5.3.1 be amended as follows; The floor areas where putrescible municipal solid waste is accepted/ handled shall be washed down and cleared of all waste so as to prevent nuisance at the end of the working day."*

**Technical Committee's Evaluation**

Of the 95,000 tonnes per annum to be accepted at the facility only 15,000 tonnes of is household waste; commercial waste (37,500 tonnes), industrial waste (37,500 tonnes) and C&D waste (5000 tonnes) are the other categories. There is to be limited handling of putrescible municipal solid waste. Hence the daily washing of the floors is a restrictive requirement.

To provide an objective management of the situation and place less of an emphasis on utilising water as a cleaning agent, the TC recommend that the wording of the condition be amended as follows. Such was agreed by the Agency for TC 177-1, which had similar issues:

***Recommendation***

Delete the wording in Condition 5.3.1 as follows:-

*and replace with the following:*

**The floor of the waste transfer building shall be cleaned on a weekly basis and on a daily basis where putrescible waste is handled. The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied, or as a minimum on a weekly basis.**

### 3

#### **Condition 7.4.1.1**

*The applicant requests that condition 7.4.1.1 conclude with "unless otherwise agreed with the Agency". Greenstar Materials Recovery Ltd propose to introduce measures to minimise dust within the waste transfer building. If such measures are successful and negligible quantities of dust emanate (demonstrated by dust monitoring) from the waste handling building, the applicant believes that the installation of PVC curtains would be an unnecessary waste of resources and impede operations at the facility by impairing the visibility of drivers entering and exiting the building.*

#### **Technical Committee's Evaluation**

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. Furthermore, it is Agency standard practice and a minimum requirement that dust control shall be maintained on the entry/exit points at waste transfer buildings. This PD does not require the installation and maintenance of a negative pressure system throughout the building to ensure no significant escape of odours or dust; such has been prescribed for other transfer stations. The licensee should be permitted to propose an alternative to dust curtains.

#### **Recommendation**

*Amend Condition to include:*

*'or equivalent approval'*

**\*\* Note:** The Technical Committee wishes to point out one typographical error in the Proposed Decision. This suggestion shall not change the meaning of the licence.

#### **Recommendation**

*Cut condition 1.4.1 and paste/overwrite onto Condition 1.5.*

#### **Overall Recommendation**

It is recommended that the Board of the Agency grant a licence to the applicant:

- (i) for the reasons outlined in the proposed decision and
- (ii) subject to the conditions and reasons for same in the Proposed Decision, and
- (iii) subject to the amendments proposed in this report.

Signed

Dated: 22 July 2004

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Malcolm Doak, Inspector, for and on behalf of the Technical Committee