

INSPECTORS REPORT

WASTE LICENCE REGISTER NUMBER 3-2

(1) Summary:

Ballymount Baling Station is an existing licensed facility (reference number W003) the licence was granted on the 7th October 1998. Existing operations on the site mainly comprise (1) Baling of municipal waste for transport to landfill disposal. (2) Provision of a waste facility for recyclable and non-recyclable waste (Civic Waste Facility) and, (3) transport of unbaleable waste to alternative facilities. The applicant now seeks a review of the licence conditions. The proposed review principally relates to an increase in annual tonnage, the operation of the facility twenty-four hours per day and the acceptance of household waste and green waste at the Civic Waste Facility.

Name of Applicant	South Dublin County Council
Facility Name (s)	Ballymount Bailing Station
Quantity of waste (tpa)	350,000
Environmental Impact Statement Required	Yes
Number of Submissions Received	1
Inspector's Recommendation	The proposed decision as submitted to the Board be approved

SITE VISITS:

DATE	PURPOSE	PERSONNEL	OBSERVATIONS
02/02/00	Check Site Notice	T Nealon	Site Notice complies with Art. 8
11/03/00	Site visit	E Merriman	

(2) Activity Summary

The facility will only accept municipal waste for baling. At the Civic Waste Facility green waste will be accepted for temporary storage prior to submission to a suitable facility for recovery, such as composting, once one has been agreed (Condition 5.3.2). The waste accepted for baling will be compacted and transported off site for disposal at a licensed facility. The Civic Waste Facility will also provide for the recovery of materials such as waste oils, beverage cans, batteries, glass bottles, scrap metals, and white goods etc (Condition 5.8).

(3) Facility Location

A location plan showing the revised outline of the site to which the application relates is provided in **Appendix 1**. The plan also shows the layout of the facility.

The facility is located on an industrial estate in Walkinstown. The principal activity occurs within a purpose-built building. There are residential areas in the vicinity but views of the facility are restricted by other development and by the ridgeline along which Greenhills Road runs. The facility is conveniently located for access to the road network including the M50 and the N7, thus facilitating both the access of waste collection vehicles and the transport of the baled waste to the Arthurstown landfill site in County Kildare.

(4) Waste Types and Quantities

The total quantities and types of wastes accepted by the facility are shown below.

YEAR	NON-HAZARDOUS WASTE (tpa)	HAZARDOUS WASTE (tpa)	TOTAL QUANTITY OF WASTE (tpa)
1998	216,284	Not Applicable	216,284
1999	300,000	Not Applicable	300,000
2000	350,000	Not Applicable	350,000 (projected)

It should be noted that the annual quantity of waste permitted under the existing licence, 180,000 tonnes, was exceeded in both 1998 and 1999.

(5) Facility Design

- **Infrastructure;**

The site occupies an area of approximately 2.86 hectares and is bounded by a 2.3m high palisade-type security fence. The reviewed licence seeks to revise the site boundary, (see Appendix 1 for site plans), to reflect developments in the vicinity of the plant principally to allow access by 'Rehab' to their recycling facility. The proposed facility is therefore somewhat smaller than the existing facility. There are two weighbridges to weigh both in-going and outgoing vehicles. A wheelcleaner and vehicle wash are also provided. Fuel storage is provided for by a number of banded, indoor and outdoor fuel storage tanks. Waste inspection and quarantine are provided for within the reception building. The following site accommodation is provided; administration building, gatehouse and civic waste facility kiosk, utility building, and waste treatment building.

(6) Facility Operation/Management

- **Waste Acceptance/Handling Procedures**

Conditions 5.1 and 5.8 specify the types of waste to be accepted at the facility. Condition 3.10 specifies that a record must be maintained for each load of waste arriving at and being removed from the site. Waste arriving at the reception area is deposited on the floor and is loaded onto the conveyors for baling only following visual inspection (Condition 5.5.2). Green waste will not be stored onsite for a period of longer than 36 hours (Condition 5.3.2).

- **Nuisance Control**

Potential nuisances are controlled by Condition 6 'Environmental Nuisances'. Household waste, which may otherwise have the potential to cause odour nuisance, cannot be stored in the Civic Waste Facility for periods of longer than 12 hours (Condition 5.2). Litter and vermin should not pose a threat due to the fast turn-around of waste which is required by Condition 6.1. Waste stored onsite prior to transport off-site to landfill will be in sealed containers. Condition 6.2 requires ongoing inspections for nuisances and Condition 6.3 requires that litter picking be carried out on a daily basis.

- **Hours of Waste Acceptance/Removal**

Condition 5.6 controls the hours of waste acceptance and removal at the facility. The hours of operation of the facility will be 24 hours per day, seven days per week once a suitable management structure for such hours is agreed with the Agency. The revision of hours of operation is partly in response to the issue of traffic congestion in Dublin as Dublin Corporation now conducts late evening collections seven days per week between 7.00 p.m. and 12.00 midnight. It also facilitates the increase in allowable annual tonnage from 180,000 to 350,000. Waste may only be accepted at the Civic Waste Facility between the hours of 8.00 and 18.00 Monday – Sunday unless otherwise agreed with the Agency.

(7) Restoration and Aftercare

The facility is intended to have an open-ended lifespan however a decommissioning and aftercare plan is required by Condition 8.1 to take account of any unforeseen circumstances.

(8) Emissions to Groundwater

No emissions to groundwater should occur as all fuel and oil tanks are to be fully banded and any liquid emissions from vehicle and other washing are directed to the foul sewer.

(9) Emissions to Air

Odour will be minimised as the activities are largely carried out within a building and because incoming waste will be baled and removed within a short time. However, there is a history of odour non-compliances at the facility and a considerable number of complaints have been received. An odour control system was installed by the licensee

and, when operational, proved effective in controlling odours. However, the system has recently broken down resulting in further complaints being received by the Agency. Delays have been experienced in fixing the odour control system and therefore Condition 6.11.2 requires a submission of a proposal for the ongoing maintenance and storage of spare parts for the system. Dust emissions will be controlled due to the operation of the dust extraction unit fitted on the feed hoppers to the baler. The emissions from vehicles servicing the facility are not expected to impact on air quality due to the relatively small increase in vehicular movements that these represent.

(10) Noise Emissions & Vibration

The predicted noise level of 30dB(A) is significantly lower than the night-time noise levels of 50 to 53 dB(A) L_{eq} measured at position N5 i.e. the nearest noise sensitive location to the facility. The facility should not be audible at this position when in full operation. It is not envisaged that the extension of hours of operation will cause any noise impact.

(11) Emissions to Sewer

The site is connected to a municipal foul sewer system. All drainage from the floor of the transfer building, loading bay, the civic amenity kiosk area, waste inspection area and waste quarantine area is directed to foul sewer, as is wash water from vehicles (as shown in Drawing No. 9805401 Rev. C of September 1999). Condition 9.1 and Schedule E.1 requires the monitoring of emissions to foul sewer. Due to exceedence of emission limit values in the existing licence in relation to suspended solids, oils, fats and grease and pH a physico-chemical treatment plant was installed. Condition 7.7.2 requires the licensee to report on the effectiveness of this treatment system and to install additional treatment plant if required.

(12) Emissions to Surface Water

Stormwater, and surface water runoff from the open area of the site discharge to the Ballymount Stream, which is almost completely culverted. This stream discharges to the Camac River. In the event of a fire in the waste reception area (thought to be the most likely location for the potential outbreak of fire) waste-contaminated firewater would be prevented from entering the surface water network by a system of bunds. The surface water drainage passes through a petrol interceptor before discharge. Condition 4.15.2 requires the licensee to report on the effectiveness of the interceptor, and to take appropriate remedial measures if the report shows a negative result.

(13) Other Significant Environmental Impacts of the Development

None

(14) Waste Management, Air Quality and Water Quality Plans

The Waste Management Plan for the Dublin Region was adopted by the relevant local authorities in December 1998. It encourages them to adopt a Regional approach to

waste management planning and it identifies as key issues waste prevention, recycling, recovery and safe disposal of waste. The recycling and baling facility is seen to be important in the adoption of such plans.

(15) Submissions/Complaints

One submission was received from Bernadette Hynes on the 15th November 1999 relating to the application. The main concerns of the complainant are as follows: there are regular odours from the facility; the bailing area is not being washed down daily as was stated originally; the facility has on occasion operated for hours longer than specified in its original waste licence; the door to the bailing station are kept open when they should be closed; at weekends waste several feet high is being stored at the station from Friday to Monday before it can be bailed. The complainant also expressed concern about the types of chemicals to be used for the purpose of odour control and the operation of the facility by IPODEC instead of South Dublin County Council.

As regards the odours emanating from the facility the licensee has installed an odour control system at the facility to combat the problem. The system uses an essential oil based odour neutraliser combined with food grade surfactants and water. The products of this odour neutralisation process are biodegradable organo-salts. Conditions 5.2, 5.3 and Condition 6 should also control odour nuisance.

Condition 6.1 requires that baled waste be removed from the facility within 48 hours. Condition 6.9 however requires that no waste be allowed to accumulate outside the waste reception area other than in appropriate enclosed containers so that odours and other potential nuisance would be mitigated against.

Condition 6.5 requires that the hopper and compactor should be cleaned of all waste on a daily basis. A new condition (Condition 5.5.3) has been inserted which requires that the doors to the baling station should be kept closed as far as is practicable.

The licensee is now applying for 24 hours per day operation Monday to Sunday.

There is no prohibition in the licence with regard to who operates the facility as long as they are technically competent etc. (Conditions 2.4 and 2.5).

Signed _____

Dated:

Inspector, Environmental Management & Planning

Assisted by Maeve McHugh

Signed _____

Dated:

Inspector, Environmental Management & Planning

APPENDIX 1
LOCATION MAP & LAYOUT PLAN