

INSPECTORS REPORT

WASTE LICENCE REGISTER NUMBER: 3-3

FACILITY: Ballymount Baling Station, Ballymount Road, Walkinstown, Dublin 12.

APPLICANT: South Dublin County Council.

INSPECTOR'S RECOMMENDATION: That a Revised Waste Licence be granted subject to conditions.

(1) Introduction:

This report relates to an application by South Dublin County Council for a Review of the existing Waste Licence for Ballymount Baling Station (Reg. No. WL 3-2 issued 08/02/01) which replaced previous Waste Licence (Reg. No. W003 issued on 07/10/98). The existing operations at the facility essentially comprise of (i) the acceptance and baling of municipal solid waste and (ii) the acceptance of recyclable and non-recyclable waste at an onsite Civic Waste Facility. Baled waste is subsequently transported offsite for disposal at landfill. Other wastes are either transported offsite for recovery or in certain limited instances sent offsite for disposal unbaled.

The enforcement of the existing waste licence (WL 3-2) and the previous waste licence (W003) has been problematic. A number of recommendations have been made by Inspectors dealing with the enforcement of the facility that the licensee be prosecuted for non-compliance with the conditions of their waste licences. The Agency recently initiated legal proceedings against the licensee for non-compliances with the existing waste licence (WL 3-2). Previous proceedings, which had been initiated during the course of the previous waste licence (W003), were withdrawn at the time as it was considered that compliance was broadly being achieved and because an application for review of the licence had been received by the Agency.

This application for review relates primarily to requests by the licensee to remove conditions of the existing licence (WL 3-2). The applicant contends that these conditions are not necessary and the licensee is currently or has been in non-compliance with them under the existing licence (WL 3-2).

The application for review is to seek amendments to a number of conditions of the existing licence and also to include waste activity. The amendments proposed by the applicant include the following;

1. The removal of the requirement to install a third baler at the facility (Condition 4.19.1 of WL 3-2).
2. The removal of the requirement for 50% standby capacity for waste handling and ventilation plant (Condition 4.19.2 of WL 3-2).
3. The removal of the requirement for a negative air pressure and emissions control system (Condition 4.19.5 of WL 3-2).
4. Amend the hours of operation (Condition 5.6 of WL 3-2).

Section 2 of this report details the proposed amendments and the Inspector's recommendations.

The classes of activity applied for are those licensed under the existing Waste Licence with the addition of Class 2 of the Fourth Schedule, i.e.

- Third Schedule of the Waste Management Act 1996; Classes 12 and 13
- Fourth Schedule of the Waste Management Act 1996; Classes 2, 3, 4, and 13.

The principal activity applied for is Class 12 of the Third Schedule. This relates to the baling of municipal waste prior to transport offsite for disposal at landfill. The additional activity applied for is Class 2 of the Fourth Schedule and this relates to the collection of recoverable materials at the Civic Waste facility such as green waste and plastics.

It is recommended that all the above activities, for which the applicant has applied in this application for a review of a waste licence, be licensed subject to the conditions outlined in the recommended Proposed Decision (PD).

Quantity of waste (tpa)	324,480 tonnes per annum (excluding waste accepted at Civic Waste Facility)
Environmental Impact Statement Required	No.
Number of Submissions Received	Six
Date application received	31/08/01

SITE VISITS:

DATE	OBSERVATIONS	PERSONNEL
01/10/01	Site Notice complies with Article 8.	Kevin McDonnell
05/03/02	Baler A undergoing extensive repairs due to structural damage to baler floor.	Donal Howley
17/04/02	Baler B undergoing extensive repairs due to structural damage to baler floor.	Donal Howley
31/05/02	Noise monitoring. Observed waste oil spill draining to surface water drainage system. Records indicating hours of operation exceeded.	David Shannon

Appendix 1 contains site location maps and a layout plan.

(2) Amendments to the Existing Licence requested in the application for review.

The amendments requested by the licensee to conditions of the existing licence and the subsequent recommendations on these requests as set out in the PD, are detailed below.

- (i) **Request for the removal of the requirement for a third baler at the facility (Condition 4.19.1 of WL 3-2):** The applicant states that a third baler would be incompatible with the current layout and operations at the site. An emergency generator was installed at the facility in late 2000 / early 2001 (during the period of assessment of objections to the PD for application 3-2) and is located adjacent to the Baling Centre. This generator is located in the most likely location for a third baler.

The increase in the quantity of waste allowed at the facility from 180,000 tonnes per annum for the previous waste licence (W003) to 350,000 tonnes per annum for the existing licence (WL 3-2) included the consideration that a third baler be provided and that operations could extend to 24-hours a day, seven days a week. The application has

requested that the Baling operations be over a 14.5-hour period over six days a week. Bearing this in mind the capability of the facility to accept and bale waste in a manner that will not cause odour problems in future is one of the key issues relating to the quantity of waste that the facility should be allowed to accept.

In consideration of this I make reference to the baling capacities estimated in Table 1 of the *Technical Committee Report on objections to Proposed Decision Reg. No. 3-2* (see below).

Table 1: *Baling Capacities*

No. of balers on site ^{Note 1}	No. of balers in operation (Duty Units)	Number of balers on standby	Standby Capacity	Hours of operation	Hourly capacity (tonnes/hour)	Daily Capacity (tonnes/day)
2	2	0	0%	11	96	1,056
2	1	1	100%	11	48	528
2	1	1	100%	24	48	1,152
3	2	1	50%	24	96	2,304

Note 1: There are currently two balers on site.

Based on these estimates Table A shows baling capacities for the facility in terms of the request in the review application for 14.5-hour operation with two balers (see also (iv) below).

Table A: *Baling Capacities*

No. of balers on site ^{Note 1}	No. of balers in operation (Duty Units)	Number of balers on standby	Standby Capacity	Hours of operation	Hourly capacity (tonnes/hour)	Daily Capacity (tonnes/day)
2	2	0	0%	14.5	96	1,392
2	1	1	100%	14.5	48	696

If standby capacity for baling were to be provided at the facility at all times (during operation) the maximum waste that could be accepted would be in the order of 696 tonnes per day. Alternatively if no standby capacity were required then 1,392 tonnes per day could be accepted. In order to ensure that there is no waste left on the floor there is a need to maintain some form of standby at the facility. The PD restricts the quantity of waste to be accepted at the Baling Centre to a maximum of 1,040 tonnes/day. This is to provide for the acceptance of waste at the facility in accordance with the requirement to have 100% duty capacity and 50% standby capacity available on a regular basis. As a consequence to this the maximum annual quantity of waste to be accepted at the Baling Centre is 324,480 tonnes (Schedule A).

The restriction on the daily quantity of waste to be accepted at the facility is also contingent on the operational basis of the two existing balers (Conditions 1.4 & 5.2.3). The licensee is required to report on a monthly basis details of the daily quantities of waste accepted at the facility, the quantities baled and details of the operational status of the balers (Condition 11.3).

- (ii) **Request for the removal of the requirement for 50% standby capacity in relation to the provision of the above mentioned baler (Condition 4.19.2 of WL 3-2):** It is recommended that this requirement be amended such that 50% standby capacity is provided on a routine basis and provision of contingency arrangements as referred to in (i) above (Conditions 3.9 & 9.5).
- (iii) **Request for the removal of the requirement for a negative air pressure and emissions control system (Condition 4.19.5 of WL 3-2):** An odour masking system is currently used to combat odours at the facility. The Annual Environmental Report (AER) for the year 8th February 2001- 8th February 2002 indicated that of 54 complaints received at the facility 53 were made regarding odours from the facility. Further

complaints have been made regarding odours from the facility subsequent to this period. While some of the odour problems may be attributed to incidents where waste has ended up being stored on the facility floor overnight, the odour management system currently employed at the facility is ineffective. Reference is also made in one of the submissions to the odour masking agent used being a sickly sweet smelling perfume. The existing waste licence (Condition 4.19.5 of WL 3-2) required a negative air pressure and emissions control system to be installed by 31/01/02. The system has not been installed and is a non-compliance with Condition 4.19.5. The applicant has not provided evidence or operated the facility in a manner to indicate that such a system is not required.

I am of the view that such a system is essential for the facility and therefore have maintained the requirement that a negative air pressure and emissions controls system be installed as a condition of the PD (Condition 3.9).

- (iv) **Revision to the hours of operation (Condition 5.6.1 of WL 3-2):** The hours requested by the applicant are effectively an increase in the hours of operation of the Baling Centre from 7.30a.m. – 6.30p.m. (as given in WL 3-2) to 6.30a.m. – 9.00p.m. Monday to Saturday. This increase in time of operation is provided for in the PD (Condition 1.7.1). The allowance for 24-hour operation at the facility upon provision of the third baler is not included in the PD as these hours were not requested in the review application and the applicant does not propose to install a third baler.

Other changes in the PD to the existing waste licence (WL 3-2) include a number of formatting and structural changes to reflect changes in recent licences issued by the Agency for waste management facilities and on foot of other amendments proposed by the applicant. These changes include the following;

- It is recommended that Class 2 of Recovery Activities, in accordance with Schedule 4 of the Waste Management Act, 1996 be allowed for the purpose of collection of recoverable materials at the Civic Waste facility, such as green waste and plastics.
- The PD requires that a Waste Inspection Area and a Waste Quarantine Area be provided such that they are clearly identified and segregated from each other (Condition 3.7).
- The PD provides for possible future amendments to the existing vehicle cleaning facilities subject to Agency agreement (Condition 3.8).
- The PD requirements for the wastewater treatment system reflects agreed changes made to the system during the course of WL 3-2 (Condition 3.12).
- The licensee is required to augment the wastewater treatment system with pH adjustment equipment (Condition 3.12). The pH of emissions to sewer has regularly been non-compliant with the required range given in Condition 7.1 and Schedule F.1 of WL 3-2.
- The applicant requested a revision be made to the requirement that green waste may only be accepted when a suitable recovery facility becomes available (Condition 5.3.1 of WL 3-2). During the enforcement of the existing waste licence (WL 3-2) the Agency agreed the use of a facility at Esker, Lucan for the purpose of accepting green waste for recovery. The requirement is not changed in the PD (Condition 5.6.3).
- The applicant requested the removal of the requirement to provide full length, heavy duty overlapping clear plastic vehicle drive through sheeting (Condition 5.5.3 of WL 3-2). The licensee included a Safety Consultant's report which detailed Health and Safety concerns regarding the provision of such sheeting at the facility. No alternative was proposed. The PD requires sheeting from the top of the door openings which extends as far down as is compatible with the safe passage of facility vehicles through the doorways unless otherwise agreed with the Agency (Condition 5.3.3). As an alternative an air curtain could be installed when the negative air pressure and emissions control system is provided.
- The Proposed Decision allows for smoking in designated areas in the facility offices as requested by the applicant (Condition 5.4.7)

- The applicant requested a revision of the noise monitoring location of the maximum noise level (85dB(A)) of 2m from source (Condition 7.1 and Schedule F.3 of WL 3-2) such that it be at 10m from source. Reference was made in this request to Table C.3 of BS5228: Part 1: 1997- Noise and Vibration Control on Construction and Open Sites. In relation to the 10m noise level referred to in this standard for wheeled loaders it is contended that the 85dB(A) limit at 2m is unlikely to be complied with. The PD sets maximum noise levels of 85dB(A) at 2m for fixed plant and of 85dB(A) at 10m for mobile plant. Noise monitoring is to be carried out annually for both daytime and night-time operations (Condition 8.1 and Schedule D.2). The daytime and night-time noise emission limits are set at 55dB(A) and 45dB(A) respectively (Schedule C.1).
- Revision of the emission limit values (ELV)s for COD and oils, fats and greases to surface water (Condition 7.1 and Schedule F.4 of WL 3-2): The ELV for COD to surface water is not altered in the PD. In keeping with recent licences issued by the Agency the PD sets an ELV for surface water discharges for the parameter Mineral Oils of 5mg/l and also sets trigger levels for Biological Oxygen Demand (25mg/l) and Suspended Solids (35mg/l). The PD requires an assessment of the drainage systems in place at the facility and proposals on improvements that should be made to the systems (Condition 3.14).

(3) Facility Development

Infrastructure

The facility principally comprises of a Civic Waste Facility and a Baling Centre - including two balers and associated conveyor belt systems and a wastewater treatment system. Waste inspection and quarantine areas are provided for within the reception area and are required to be segregated from each other. Other infrastructure on site includes two weighbridges to weigh both in-going and outgoing vehicles, wheelcleaner and vehicle wash, administration building, gatehouse and civic waste facility kiosk, utility building, and a number of bunded fuel storage tanks. An emergency generator was installed at the facility and commissioned in February 2001. It is situated outside and adjacent to the north-eastern side of the Baling Centre. The applicant does not propose to install any new infrastructure at the facility. As referred to in Section (2) above the PD requires the installation of a negative air pressure and emissions control system.

(4) Waste Types and Quantities

The application for review did not request any changes to the types or quantities of waste to be accepted at the facility. The existing licence limits acceptance of waste at the Baling Centre to 350,000 tonnes per annum of Municipal Waste. The PD limits the acceptance of Municipal Waste at the Baling Centre to 324,480 tonnes per annum (Condition 1.4). The PD also limits the quantity of waste acceptable at the facility on a daily basis and on the operational basis of the two existing balers to ensure that incidents involving waste being left on the floor overnight do not occur (Conditions 1.4 & 5.2.3). No waste is to be accepted at the facility for baling when both balers are inoperable (Condition 9.5). Waste arriving at the waste reception area is deposited on the floor and is loaded onto the conveyors for baling only following visual inspection (Condition 5.3.2).

Contingency arrangements are required in the PD (Condition 9.5) to be provided to cater for the event that when a baler becomes inoperable the licensee shall carry out the following:

- (i) determine the amount of unbaled waste at the facility;
- (ii) determine the amount that the facility can process with the other baler (if operable) for the remainder of the operational day;
- (iii) provide for the removal offsite to appropriate facilities of any waste on site above that amount that can be processed; and

(iv) provide for the diversion of waste prior to reaching the baling facility.

Waste acceptance at the Civic Waste Facility is controlled under Condition 5.6 of the PD as well as Condition 1.4. Green waste will not be stored onsite for a period of longer than 48 hours (Condition 5.6.3).

The following is a summary of waste quantities accepted at the Baling Centre for baling as indicated in the three Annual Environmental Reports (AERs) submitted for the facility.

Report	Waste Licence in force	Period covered	Waste Quantity (tonnes)	Waste Quantity allowed under licence (tonnes/annum)
AER 1	W003	07/10/98 – 07/10/99	267,421	180,000
AER 2	W003	07/10/99 – 07/10/00	278,239	180,000
AER 3	WL 3-2	08/02/01 – 08/02/02	276,149	350,000 ^{Note 1}

Note 1: This was subject to the provision of adequate infrastructure and the negative air pressure and emissions control system.

(5) Management and Control of Emissions to the Environment

The environmental impacts and associated mitigation measures associated with this facility were addressed in detail in the Inspector's Reports, which accompanied the recommended Proposed Decisions for the existing Waste Licence (WL 3-2) and for the previous Waste Licence (W003). However, to date there remains a significant problem regarding odours at the facility. There are two key issues in relation to odour problems at this facility, which are discussed below.

(I) The baling capacity of the facility and the acceptance of quantities of waste at the facility in excess of the facility's capability to promptly bale the waste.

Appendix II lists and gives details of the incidents which were notified to the Agency under Condition 3.3 of the existing waste licence (WL 3-2) up to the time of writing. Incidents notified to the Agency under the existing licence (WL 3-2) [and also from correspondence dated 15th June 2001 from South Dublin County Council], indicate that there have been in the order of ninety-four nights during the period from 08/02/01 to date in which waste has been left on the floor of the WRA in non-compliance with Condition 6.5 of the waste licence (WL 3-2).

To date under the existing licence (WL 3-2) seven notifications of non-compliance have been issued to the licensee, six of which relate to the leaving of waste on the floor of the Baling Centre overnight. The existing waste licence (WL 3-2) allows for 24 hours operation of the Baling Centre in the instance of a third baler being provided and eleven hour operation prior to this. The applicant applied for the requirement of the third baler to be removed and the PD does not require a third baler and the operating hours have been restricted to 14.5 hours a day. This increase in baling time will improve the facility's capability to promptly bale waste.

(II) Odour management at the facility.

The odour management system currently in operation at the facility is essentially a masking system. A masking agent is sprayed in the facility building and at the doors and when considered necessary on the waste. Consultants working on behalf of the applicant in a report on odours from the facility dated 16th July 2001 consider that the Baling Centre

“operating under normal conditions does not require a negative air pressure system or odour control abatement technology in order to reduce odour levels”. As discussed in section (2) above and further in section (7) below complaints about odours from the facility have been made throughout the course of the current waste licence (WL 3-2) and the previous waste licence (Reg. No. W003).

In order to adequately deal with the odour issue a negative air pressure and emissions control system is required by the PD (as required in WL 3-2) in conjunction with the management of the waste intake in terms of baling capacity as referred to in section (4) above.

Sect 52 notice:

A letter was issued to the Sanitary Authority (South Dublin County Council) under Section 52 of the Waste Management Act 1996 on 8th May 2002 in relation to the discharge from the facility to sewer. To date no response has been received. The requirements of the PD in relation to emissions to sewer are similar to those in the existing waste licence (WL 3-2).

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

The Waste Management Plan for the Dublin Region was adopted in December 1998 by the relevant local authorities. The plan advocates a regional approach to waste management planning and identifies the waste hierarchy as a key issue in terms of prevention, re-use, recycling, energy recovery and disposal. Ballymount Baling Station is considered as an important component of the plan. It is noted that the plan refers to the Ballymount facility as having 220,000 tonnes/annum reliable capacity.

(7) Submissions/Complaints

Six submissions have been received in relation to this application. All six submissions were received from Mr. Chris Merrigan on behalf of the Greenpark Residents Association dated 02/01/02, 04/02/02, 23/04/02, 24/07/02, 25/07/02 and 31/07/02. The issues/concerns/requests raised in the submissions include the following;

Odours:

- The main issue is identified as the odours from the facility.
- The smells from the facility persist. The facility is still intermittently generating odours that can be smelled deep within Greenpark Estate.
- The Agency is expected to restrict the operation of the facility to a level and standard to allow residents to live without the threat of *“putrid odours or that sickly sweet smelling perfume that they spray”* as camouflage.
- The facility does not have sufficient baling capacity to handle its current tonnages as per WL 3-2.
- The facility has no effective odour control system (negative air).
- If smells can be detected at 7.15 a.m. and 7.30 p.m. (23/04/02) then the facility is operating outside of its licensed operating hours.
- Reference is made to both balers having broken down for an extended period during March 2002.
- It is reasoned that waste must be left on the floor overnight or that the floor is not being cleaned as the submitter frequently smells odours at 7.15 a.m. on Greenhills Road when coming from Greenpark Estate.
- Odours were particularly bad in two weeks up to 24/07/02.

- The facility should be shut down because it is generating putrid odours affecting residents in breach of its licence, because of its inappropriate location within 100m of a housing estate and because of the owners and operators having displayed no intention of operating within the licence.

Licensee:

- Expressing serious concerns over the operation of the Baling Centre by South Dublin County Council which has grossly failed to address the odour issue by failing to comply with conditions of waste licence WL 3-2.
- That he has issued correspondence to public representatives from South Dublin County Council.

Complaints:

- Reference is made to a letter from Mr. Keogh of South Dublin County Council which refers to the receipt of four complaints for the facility for the period September-December 2001. It is stated that fifty-one complaints were recorded in January-October 2001 and over one hundred in 1999.
- Complaints are not being logged by IPODEC/SDCC.
- Reference is made to damage to one of the doors to the Waste Reception Area which resulted in the door being left open over night for two weeks and was still to be repaired (as of 24/07/02).
- A truck of refuse was observed entering the facility late in the evening (9.53 p.m. on 22/07/02) and the truck tipped its load and departed.

Application:

- Requesting information on the status of the application.
- Requesting adequate notice be given to the Greenpark Residents Association so that any aspect of a licence 3-3 that Greenpark Residents Association consider inappropriate can be challenged.
- The EPA are procrastinating and have been for almost one year on the review application.

Enforcement

- Questions regarding changes of Inspector and withdrawal of legal actions were also made.
- Concern is expressed over the policing of the licence by the Agency. Expressing intent that a formal complaint will be made to the European Commission against the Agency if the issues affecting the Greenpark residents are not satisfactorily concluded within six months (submission of 03/01/02).
- The EPA are aware that SDCC are not operating to the conditions of the licence.
- In relation to a proposed meeting between the licensee and the Greenpark Residents Association it is requested that any such meeting should be attended by the EPA Inspector responsible for the facility (even in an observer capacity).

Inspector's Comment

The PD sets out conditions on how the licensee is required to operate the facility. This includes the requirement for a negative air pressure and emissions control system. It also specifies the quantity of waste that can be accepted at the facility on a given day, depending on the operational status of the balers. It also provides for an additional three-and-a-half hours per day of operational time to facilitate additional baling without increasing the overall waste tonnage allowed at the facility. As part of the enforcement of the waste licence the Agency will undertake site inspections, audits and compliance monitoring checks as well as reviewing records and proposals required under the terms of the licence

As stated in section (1) above the Agency is currently undertaking legal proceedings against the licensee over a number of non-compliances with the existing licence (WL 3-2).

The following is a summary of the complaints that have been received at the facility, as reported in the Annual Environmental Reports (AER)s and correspondence submitted by the licensee;

Report/ Letter	Waste Licence in force	Period covered	No. of Complaints <small>Note 1</small>	No. of complaints regarding odours
AER 1	W003	07/10/98 – 07/10/99	17	17
AER 2	W003	07/10/99 – 07/10/00	116	115
AER 3	WL 3-2	08/02/01 – 08/02/02	54	53
14/08/02	WL 3-2	08/02/02 – 08/08/02	57	57

Note 1: Other issues of complaints were noise (1), flies/insects (6) and vermin (3)

(8) Reasons for the Recommendation

I recommend that a revised waste licence, subject to conditions, be **granted** in accordance with the conditions in the recommended Proposed Decision.

In making the recommendation for a revised waste licence I have taken into account all information submitted as part of the application, submissions and also information in relation to the existing and previous waste licences for the facility. I have considered that odours from the facility have been a problem at the facility as a result of non-compliances with conditions of the existing waste licence (WL 3-2). In particular this is due to the lack of an effective odour management system and the regular basis on which waste has been left on the floor of the Waste Reception Area of the Baling Centre overnight. In order to ensure that the facility operates such that it does not cause an odour nuisance an effective odour management system is required and the facility should only accept waste that it can adequately process on that day.

In coming to this recommendation, I consider that the continued operation of the Baling Centre and the associated activities and works would, subject to the conditions of the recommended Proposed Decision, comply with the requirements of Section 40(4) of the Waste Management Act 1996.

Signed: _____

Dated: _____

Donal Howley
Inspector,
Environmental Management & Planning

APPENDIX I

SITE LOCATION MAP & LAYOUT PLAN

APPENDIX II

Incidents Notified to the Agency under Condition 3.3 of Waste Licence Reg. No. 3-2
+
Correspondence from South Dublin County Council dated 15/06/01

Incident No.	Date of Incident	Incident ^{Note 1}	Cause	Comment
1.	22/02/01	Some waste on Waste Reception Area (WRA) floor overnight	Downtime - Baler A (2.5hrs) – Baler B (all day)	
2.	27/02/01	Unable to transport baled waste offsite	Heavy snow & strong winds	
3.	13/03/01	Clinical waste received	Unknown source (in black bag)	Shipped for incineration by IES
4.	16/02/01	NC for ELVs to foul sewer	SS, OFG & Ammonia	Intention to install 500micron drum screen
5.	18/04/01	250 tonnes of waste on WRA floor overnight (17 th /18 th)	Baler A downtime (10hrs)	
6.	19/04/01	200 tonnes of waste on WRA floor overnight (18 th /19 th)	Backlog from day before	
7.	16/04/01 & 20/04/01	Clinical waste received	Unknown source (in bags)	Shipped for incineration by IES
8.	20/04/01	200 tonnes of waste on WRA floor overnight (19 th /20 th)	Backlog	
9.	30/04/01	Shutter 1 of WRA can not be closed – open overnight	Mechanical Fault	
10.	04/05/01	500 tonnes of waste on WRA floor overnight	Wire strapper failure – 4.5hr combined baler downtime	
11.	10/05/01	250 tonnes of waste on WRA floor overnight (9 th /10 th)	Wire strapper problems	
12.	11/05/01	375 tonnes of waste on WRA floor overnight (10 th /11 th)	Wire strapper problems	
13.	12/05/01	375 tonnes of waste on WRA floor overnight (11 th /12 th)	Wire strapper problems	
14.	13/05/01	375 tonnes of waste on WRA floor overnight (12 th /13 th)	Wire strapper problems	
15.	14/05/01	375 tonnes of waste on WRA floor overnight (13 th /14 th)	Wire strapper problems	
16.	15/05/01	450 tonnes of waste on WRA floor overnight (14 th /15 th)	Wire strapper problems + Backlog	
17.	15/05/01	NC for ELVs to surface water on 05/04/01	COD at SWE1A & SWE1B	
18.	16/05/02	100-150 tonnes of waste on WRA floor overnight (15 th /16 th)	Backlog	
19.	24/05/01	225 tonnes of waste on WRA floor overnight (23 rd /24 th) + Door 4 of WRA open overnight	Mechanical fault	
20.	01/06/01	Bag of clinical waste received	Coombe Hospital	ERP implemented
21.	07/06/01	250 tonnes of waste on WRA floor overnight (6 th /7 th)	Traffic congestion due to road accident restricted delivery of baled waste	
22.	08/06/01	300 tonnes of waste on WRA floor overnight (7 th /8 th)	Backlog	
23.	15/06/01	WWTP offline	Due to repair works on leak	
24.	27/06/01	600 tonnes of waste on WRA	Baler A Downtime	

Incident No.	Date of Incident	Incident ^{Note 1}	Cause	Comment
		floor overnight (26 th /27 th)		
25.	28/06/01	356 tonnes of waste on WRA floor overnight (27 th /28 th)	Baler A Downtime	
26.	29/06/01	203 tonnes of waste on WRA floor overnight (28 th /29 th)	Baler A Downtime	
27.	05/07/01	156 tonnes of waste on WRA floor overnight (5 th /6 th)	Baler A Downtime (2hrs)	
28.	06/07/01	160 tonnes of waste on WRA floor overnight (6 th /7 th)	Backlog	
29.	27/06/01	NC for ELVs to foul sewer	SS & OFG	To clean and empty foul interceptor + plan modifications
30.	27/06/01	NC for ELVs to surface water	COD at SWE1A & SWE1B	
31.	28/07/01	150 tonnes of waste on WRA floor overnight (27 th /28 th)	Downtime – Baler A (4.5hrs) and Baler B (1hr)	
32.	21/08/01	160 tonnes of waste on WRA floor overnight (20 th /21 st)	Baler A Downtime (2hrs)	Baler B being overhauled
33.	22/08/01	325 tonnes of waste on WRA floor overnight (21 st /22 nd)	Baler A Downtime (2.5hrs)	Baler B being overhauled
34.	23/08/01	160 tonnes of waste on WRA floor overnight (22 nd /23 rd)	Backlog	Baler B being overhauled
35.	29/08/01	200 tonnes of waste on WRA floor overnight (28 th /29 th)	Baler downtime (4hrs)	
36.	06/09/01	NC for ELVs to surface water	COD at SWE1A & SWE1B	
37.	13/09/01	295 tonnes of waste on WRA floor overnight (12 th /13 th)	Insufficient quantity transferred offsite	Baler A being overhauled
38.	16/09/01	150 tonnes of waste on WRA floor overnight (15 th /16 th)	14 th inoperative + volumes accepted	Baler A being overhauled
39.	17/09/01	150 tonnes of waste on WRA floor overnight (16 th /17 th)	14 th inoperative + volumes accepted	Baler A being overhauled
40.	07/11/01	NC for ELVs to surface water and sewer	COD (SWE1A & SWE1B) & pH (F6)	
41.	15/11/01	NC for ELVs to surface water	COD at SWE1A & SWE1B	
42.	11/12/01	300 tonnes of waste on WRA floor overnight (10 th /11 th)	Traffic congestion	
43.	07/01/02	Odour control system offline	Pump failure	
44.	15/02/02	200 tonnes of waste on WRA floor overnight (14 th /15 th)	Baler a downtime (strapper anchor failure)	
45.	25/02/02 to 08/03/02	Baler A to be overhauled during this period	Serious structural damage	
46.	27/02/02	300 tonnes of waste on WRA floor overnight (26 th /27 th)	Baler B downtime on 26 th (wire knotter failure)	Baler A being overhauled
47.	28/02/02	220 tonnes of waste on WRA floor overnight (27 th /28 th)	Baler B downtime on 26 th (wire knotter failure)	Baler A being overhauled
48.	01/03/02	280 tonnes of waste on WRA floor overnight (28 th /1 st)	Baler B downtime on 26 th (wire knotter failure)	Baler A being overhauled
49.	08/03/02	NC for noise ELV	General Road Traffic	

Incident No.	Date of Incident	Incident ^{Note 1}	Cause	Comment
50.	2/04/02 to 12/04/02	Baler B to be overhauled during this period	Serious structural damage	Back on line on 23/04/02
51.	05/04/02	700 tonnes of waste on WRA floor overnight (4 th /5 th)	Baler A downtime	Baler B being overhauled
52.	06/04/02	200 tonnes of waste on WRA floor overnight (5 th /6 th)	Baler A downtime	Baler B being overhauled
53.	24/04/02	200 tonnes of waste on WRA floor overnight (23 rd /24 th)	Too much waste accepted (including from Kildare County Council)	To stop taking Kildare County Council waste
54.	26/04/02	180 tonnes of waste on WRA floor overnight (25 th /26 th)	Baler B downtime (2hrs)	
55.	14/05/02	NC for ELVs for surface water	COD & OFG	
56.	21/05/02	Baler B operated until 8p.m. (1.5 hours beyond time allowed)	Baler A downtime (2hrs)	No waste on floor of WRA
57.	04/06/02	NC for ELVs for surface water & sewer	OFG (SWE1B) and pH & Ammonia (F6)	
58.	27/06/02	NC for ELV for surface water	COD	
59.	26/06/02	Baler A downtime (operated for 2hrs only)	Problem with hydraulic oil	All waste baled or transferred
60.	04/07/02	Baling until 8p.m. (1.5 hours beyond time allowed) + 90 tonnes of waste on WRA floor overnight (4 th /5 th)	Baler A downtime (between 1.00p.m. and 6.30p.m.)	200 tonnes of waste diverted
61.	09/07/02	Baler B operated until 8.00 p.m. (1.5 hours beyond time allowed)	Baler A downtime (all of 8 th & 9 th and until 11.00 on 10 th)	No waste on floor of WRA
62.	22/07/02	Municipal waste delivered at 9.45 p.m. & Door 2 to WRA can not close	Main facility gates left open at request of REHAB (adjacent facility) & truck collided with door	Fax of 30/07/02 indicated that door would be operational by end of day
63.	24/06/02	NC for ELVs to sewer	pH & Ammonia	
64.	31/07/02	Baling until 7.30 p.m. (1.0 hour beyond time allowed)	Baler A downtime (6 hours)	No waste on floor of WRA
65.	07/08/02	Baling of waste until 8.30 p.m. (2.0 hours beyond time allowed) on both 7 th & 8 th August	Baler B fault causing it to work inefficiently on 7 th and was shut down on 8 th .	10 odour complaints received on 7 th . No waste on floor of WRA
66.	10/08/02	75 tonnes of waste on WRA floor overnight (10 th /11 th & 11 th /12 th) + NC for ELV to sewer	Drive shaft failure on Conveyor B on 10 th . OFG of 233 mg/l	Conveyor B expected to be out of operation for the week.
67.	13/08/02	Baler B operated until 10.00p.m. (3.5 hours beyond time allowed) + amended SW result indicating NC for ELV for surface water	Follow on from drive shaft failure on Conveyor B. COD value of 2358mg/l on 13/05/02	No loose waste on floor of WRA
68.	14/08/02	Facility operated until 10.00p.m. (3.5 hours beyond time allowed)	Unexpected high volume of waste & problems with both shunter vehicles.	No loose waste on floor of WRA. Diversion of waste organised with Ballyogan Landfill

Note 1: Correspondence dated 15/06/01 from South Dublin County Council giving revised details of incidents during the period between 08/02/01 and 10/06/01 (attached).