

INSPECTORS REPORT
WASTE LICENCE REGISTER NUMBER 39-1

(1) Summary:

Name of Applicant	IPODEC (Ireland) Ltd.
Facility Name (s)	IPODEC (Ireland) Ltd.
Facility Address	Ballymount Cross, Tallaght, Dublin 24.
Description of Principal Activity	Transfer Station
Quantity of waste (tpa)	50,000
Environmental Impact Statement Required	No
Number of Submissions Received	None
INSPECTOR'S RECOMMENDATION	The proposed decision, as submitted to the Board, be approved.

Notices	Issue Date(s)	Reminder(s)	Response Date(s)
Article 14 (2) (b) (i)	Not Applicable		
Article 14 (2) (b) (ii)	26 May 98 16 July 98 14 August 98	Not Applicable	30 June 98 7 August 98 24 August 98
Article 14 (2) (a)	1 September 98		
Article 16	16 September 98 3 November 98 19 January 99	11 February 99	16 October 98 28 October 98 3 December 98 5 February 99 19 February 99

Applicant Address	Ballymount Cross, Tallaght, Dublin 24.
Planning Permission status and date granted (if appropriate)	Granted 7/7/94
Planning Authority	South Dublin County Council
For Local Authority applicants, is the facility within its own functional area	Not Applicable
Is the facility an existing facility:	Yes
Prescribed date for application:	prior to 1 st May 1998
Date Application received:	30 th April 1998
For Certified Sites, have matters in the EIS relating to environmental pollution been considered as required by Article 21 of SI 133 of 1997	Not Applicable
Location of Certificate in Application	Not Applicable
Confidential Information Submitted	None
Location of Planning Documents in Application	Section B.4
Location of EIS in Application	Not Applicable

FACILITY VISITS:

DATE	PURPOSE	PERSONNEL	OBSERVATIONS
25/5/98	Site Notice check and site inspection	E. Merriman	Site Notice compliant with Regulations.
19/2/99	To check developments prior to PD.	E. Merriman	Visit site and surrounds.

(2) Class/Classes of Activity

The class(es) of activities for which the applicant has applied are marked below. The principal activity is indicated by (P), other activities by (X).

Waste Management Act, 1996			
THIRD SCHEDULE Waste Disposal Activities		FOURTH SCHEDULE Waste Recovery Activities	
1. Deposit on, in or under land (including landfill).		1. Solvent reclamation or regeneration.	
2. Land treatment, including biodegradation of liquid or sludge discards in soils.		2. Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).	X
3. Deep injection of the soil, including injection of pumpable discards into wells, salt domes or naturally occurring repositories.		3. Recycling or reclamation of metals and metal compounds.	X
4. Surface impoundment, including placement of liquid or sludge discards into pits, ponds or lagoons.		4. Recycling or reclamation of other inorganic materials.	X
5. Specially engineered landfill, including placement into lined discrete cells which are capped and isolated from one another and the environment.		5. Regeneration of acids or bases.	
6. Biological treatment not referred to elsewhere in this Schedule which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1 to 10 of this Schedule.		6. Recovery of components used for pollution abatement.	
7. Physico-chemical treatment not referred to elsewhere in this Schedule (including evaporation, drying and calcination) which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1 to 10 of this Schedule.		7. Recovery of components from catalysts.	
8. Incineration on land or at sea.		8. Oil re-refining or other re-uses of oil.	
9. Permanent storage, including emplacement of containers in a mine.		9. Use of any waste principally as a fuel or other means to generate energy.	
10. Release of waste into a water body (including a seabed insertion).		10. The treatment of any waste on land with a consequential benefit for an agricultural activity or ecological system,	
11. Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule.		11. Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule.	
12. Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.	P	12. Exchange of waste for submission to any activity referred to in a preceding paragraph of this Schedule.	
13. Storage prior to submission to any activity referred to in this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.	X	13. Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced.	

Class description:

Third Schedule

Class 12: This refers to the transfer of non-recoverable waste into large ejector trailers for transfer to landfill.

Class 13: This refers to the temporary storage of non-recoverable wastes prior to dispatch to landfill.

Fourth Schedule

Class 2: This refers to the recovery and temporary storage of cardboard and wood separated from waste accepted at the facility. It also refers to possible future recovery of plastic from waste accepted at the facility.

Class 3: This refers to the recovery and temporary storage of metals separated from waste accepted at the facility.

Class 4: This refers to possible future recovery and temporary storage of construction and demolition wastes.

Activities recommended for licensing:

It is recommended that all the above activities, for which the applicant has applied for a waste licence, be licensed subject to the conditions contained in the Proposed Decision.

(3) Facility Location

Appendix 1 contains a location drawing and a layout drawing showing the significant features of the facility.

The facility is located on Upper Ballymount Road. It has ready access to the M50 motorway. The site is leased from William O'Brien Plant Hire Ltd. There are a small number of residential properties within 250 metres of the facility which are also located on Upper Ballymount Road. Otherwise buildings in the vicinity consist of factories and warehouses.

(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)
1996	35,000	0	35,000
1997	37,362	0	37,362
1998	45,873 (Budgeted)	0	45,873 (Budgeted)

(5) Activity Summary

This facility operates as a commercial waste transfer station. Commercial, industrial and domestic non-hazardous wastes are accepted. Currently most of the waste is repackaged into large containers for transport to landfill. Some cardboard, wood and metal wastes are recovered.

(6) Facility Operation/Management

- **Waste Acceptance Procedures**

The facility is not open to casual use. Waste is only accepted from existing IPODEC customers. Before IPODEC undertake to accept waste from a new customer, the waste type is first checked and profiled. (Condition 5.5)

Conditions 5.1 and 5.2 specify the waste types acceptable at the facility. Hazardous waste is not acceptable at the facility. Condition 3.13 specifies the record that must be maintained for each load of waste arriving at the site.

All waste loads entering the facility must use the weighbridge. The weighbridge, which records throughput, is visible from the operations office and under the scrutiny of a closed circuit television camera. Regular drivers operate the weighbridge themselves through the use of smart cards issued by the licensee. The waste is then deposited on the floor of the Transfer Building where it is inspected for suitability (Condition 5.6). Condition 5.7 states that unsuitable waste must be diverted to the Waste Quarantine Area to be put in place within six months under Condition 4.7, pending transfer to an alternative appropriate facility. In the interim, unsuitable waste will be temporarily stored at a designated location within the Transfer Building (Condition 5.7) agreed by the Agency.

- **Waste Handling**

All waste loads are deposited on the floor of the Transfer Building.

Cardboard rich waste is segregated for hand sorting and baling using a conveyor belt/hydraulic baler process. This baled cardboard is then either stored inside the Transfer Building or in covered containers outside the transfer building pending dispatch from the facility. Metal and wood are separated from the waste stream using a mobile mechanical grab. This grab transfers these waste types to open skips which are stored inside the Transfer Building pending dispatch **WHERE?** from the facility. The storage of recovered materials at the facility is regulated through Condition 5.9.

Other wastes streams, namely plastics and C&D waste, may be recovered in future. Condition 5.2 will allow the acceptance of these wastes while Condition 5.13 requires proposals for the recovery of appropriate components of the waste being accepted at the facility. Condition 5.3 requires the licensee to submit proposals for new waste processing systems to the Agency for its agreement.

Non-recoverable waste is transferred from the floor of the Transfer Building using a mechanical loader into 70 metre ejection trailers in the adjacent Loading Bay for dispatch to a landfill site.

Waste destined for landfill, recovered and rejected materials are recorded (weight, destination, nature, etc.) prior to dispatch from the facility (Condition 3.14).

- **Nuisance Control**

Litter and vermin (rats, birds and flies) should not pose a major nuisance problem due to the fast turn-around of putrescible waste (Condition 6.1) and the fact that all handling of waste, other than baled cardboard storage and possibly waste at the Waste Quarantine Area (which is to be installed subject to agreement), is carried out indoors. Section F.9 of the application proposes use of insecticide to control fly infestation. Furthermore, Condition 6.7 requires a Vermin Control Plan to be submitted to the Agency.

Conditions 6.4, 6.5 and 6.6 will minimise the possibility of litter generation outside the Transfer Building. Section F.5 of the application proposes daily boundary litter patrols, and this proposal will be implemented through Condition 6.3.

Odour and noise nuisance will be regulated through Conditions 6.2 and 7.2. Control of odour and dust emissions from the Transfer Building should be aided by a deodouriser spraying system recently installed therein.

No wheelwash is proposed for this facility. All traffic movements on site are on concrete surfaces and road vehicles do not pass over deposited waste. However, at present mud can accumulate on the yard immediately outside the Transfer Building. Condition 6.3 specifies that the yard area is to be kept clean. In addition a vehicle washing facility is available as required (Condition 4.19). Furthermore, Conditions 6.5 and 6.6 provide for the protection of the public highway. Thus it is envisaged that the public highway will be protected from muck/litter deposition due to vehicles exiting the site.

- **Dust Emissions**

Dust emissions from waste handling activities within the Transfer Building and fugitive dust emissions from on-site traffic are the dust emission sources. Two dust deposition surveys indicate that the proposed emission limit of 240 mg/m²/day (Condition 7.1) may be breached at all four facility boundaries. However, the contribution from Ballymount Road may be having a significant impact on dust levels deposited at the facility boundaries particularly on the Ballymount Road boundary. Therefore it is not proposed to set a dust emission limit for this boundary, but a limit of 240 mg/m²/day has been set for the other three boundaries (Condition 7.1). The licensee will be requested to investigate the source of emission limit breaches at the other three boundaries through Condition 10.8.

Dust Control: a recently installed deodoriser sprinkler system (the maintenance of which is specified in Condition 4.14) in the Transfer Building should alleviate the problem. Condition 7.5 specifies that the licensee shall submit a written procedure for the control of dust emissions from the site for the agreement of the Agency. It is envisaged that this procedure will cover dust emissions from the Transfer Building and fugitive dust emissions from on-site traffic. Therefore, improved operational practices and the use of the deoderiser system in the Transfer Building should provide for satisfactory dust control.

- **Hours for Waste Acceptance**

Condition 5.11 lays down the following operating hours, as specified in the licence application, subject to change agreed by the Agency:

Monday to Friday

7.30am to 8pm for period March to October

8am to 6pm for period November to February

(7) Facility Design

- **Infrastructure;**

The facility, with an area of 11,884 m², has three main components; a Transfer Building, a Garage and an Office Block. All waste handling occurs within the Transfer Building. All drainage from within the transfer building will discharge to foul sewer (Conditions 4.11 and 4.20). A sprinkler system has been installed to reduce dust emissions from the waste processing.

(8) Restoration and Aftercare

IPODEC propose to remove all plant, waste, raw materials and substances from the site upon cessation of activities, thereby removing all potential sources of environmental pollution (Condition 8.1). Furthermore, Condition 11.2.1 provides for a costed Environmental Liabilities Risk Assessment in advance of facility closure. It is envisaged that no aftercare will be required for this site following this clean-up due to the nature of the activities undertaken at this site. However, Condition 8.1 allows for a review of the decommissioning and aftercare plans at the instigation of the Agency. Condition 11.2 will generate a financial provision for the closure of the site.

(9) Hydrogeology

There are no direct emissions to groundwater, and Condition 7.6 forbids any direct discharges. Surface water from hardstanding areas of the site discharges either to

the River Liffey catchment via a storm drain or to Local Authority foul sewer. However, significant sections of the site, which are covered by blinded hardcore, could potentially be routes for indirect groundwater contamination. Empty skips and lorries are stored in these areas.

The following conditions should prevent indirect groundwater contamination: Conditions 5.9 and 5.10 state that these areas are not to be used for the storage of potentially polluting matter, and Condition 4.18 requires the provision of an impermeable surface for truck parking in order to protect groundwater from indirect fuel and oil discharges.

(10) Emissions to Air

The potential emissions to air at this site are dust from the Transfer Building and fugitive dust from on-site traffic.

(11) Noise Emissions

The sources of noise emissions are a bulldozer, an excavator, site traffic and a cardboard compactor/baler. The facility is located in an industrial area adjacent to the busy Upper Ballymount Road. However, there are some private residences (sensitive noise receptors) located to the south east of the site entrance on Upper Ballymount Road. The results of two noise surveys indicate that traffic on the Ballymount Road is primarily responsible for high noise levels, both at the sensitive receptors, the nearest one of which was monitored, and the site boundaries.

Control of noise emissions through nuisance avoidance (Conditions 7.2 and 7.3) rather than through specific emission limits is proposed. Condition 4.3.1 requires gaps in the perimeter hedge to be replanted, thus improving noise attenuation. Annual monitoring at three site boundary locations and the previously monitored sensitive receptor will be undertaken (Condition 9.5).

(12) Emissions to Sewer

There is one emission point to sewer (Condition 7.8.1). In addition to domestic effluent, the discharge to sewer will include vehicle wash waste-water, any surface water which may come into contact with waste in the waste handling area (Conditions 4.11 and 4.20), and some discharges from oil interceptors.

Emission limits (Schedule G), general conditions (Condition 7.8) and the instalment of on-line monitoring (Conditions 9.2.1 and 9.2.2) have been included at the request of the Sanitary Authority. Additionally a new monitoring station has been conditioned (Condition 9.2.3) in order to provide for representative sampling. This monitoring station will incorporate a shut-off valve, thus allowing for containment of wastewater and Condition 10.5 requests a fire-water retention study, again satisfying the Sanitary Authority requirements and protecting the sewer from

unauthorised discharges. Condition 9.1 provides for the monitoring of discharges to the Sanitary Authority sewer.

(13) Emissions to Surface Water

All surface water run-off is discharged to a storm sewer at a location on the Upper Ballymount Road (Condition 7.7.1) before discharging in turn to the Camac River and thence to the River Liffey. The facility poses risks to the receiving surface waters from both routine yard run-off (low level contamination) and spillages. Redesign of the surface water drainage system, bunding of the diesel storage tank, and monitoring of discharges should ensure protection of the receiving waters.

All surface water drainage, other than that from the weighbridge and office car park area, passes through an oil separator before discharge (Condition 4.10). Condition 4.23 requires the evaluation of this separator against the draft European standard. Upon implementation of the license, there shall be no discharges from the Transfer Building, potentially dirty yard areas or the vehicle wash area to the surface water system (Conditions 4.11, 4.19 and 4.20). Thus the risk of contamination of the receiving waters as a result of routine yard run-off will be greatly reduced.

Condition 4.17 provides for the diesel storage tank to be bunded. Condition 10.1 requires implementation of an Emergency Response Procedure which will cover contamination of the surface water discharge system. The new surface water discharge sampling station will incorporate a shut-off system for spill containment (Condition 9.3.1). Condition 10.2 specifies provision of spill abatement material. Condition 4.15 specifies that the surface water system and foul sewer entry points are colour coded to enable staff to rapidly appraise contamination risks in the event of an incident. Thus the risk of contamination of the receiving waters as a result of spill events will be greatly reduced.

A new agreed monitoring point is to be provided which will allow representative sampling of the entire discharge (Condition 9.3.1). Monitoring is provided for through Condition 9.1. No emission limits are conditioned. However, descriptive conditions (7.2, 7.7.2 and 7.7.3) provide for the protection of the receiving waters.

(14) Other Significant Environmental Impacts of the Development

None.

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

1. The Water Quality Management Plan for the Liffey Catchment only relates to the Liffey catchment upstream of Islandbridge. The relevant plan is the Dublin Bay Water Quality Plan. Other than noting that the Camac river is supportive of fish life

whilst being eutrophic, no water quality objectives are set for it. Condition 7.7.3 prohibits discharges to surface water of materials that may be injurious to fish life.

2. There is no Air Quality Management Plan for Dublin.

(16) Submissions/Complaints

One submission was received from Duchas on the 19th April 1999. This submission stated that they have no archaeological objections to this facility.

Signed: _____

Dated: _____

Eamonn Merriman, Inspector,
Environmental Management and Planning.

APPENDIX 1

LOCATION PLANS