

INSPECTORS REPORT
WASTE LICENCE REGISTER NUMBER 39-2

(1) Summary:

IPODEC Ireland Ltd. applied for a review of waste licence number 39-1 which was issued on the 25th November 1999. The reasons put forward by the licensee for this review are:

- To increase their waste intake limit from 50,000 to 150,000 tonnes per annum;
- To increase their operating hours from a daytime six day a week operation to a 24 hours seven day a week one;
- To add additional classes of waste activities to their licence, namely Class 11 of the Third Schedule and Class 13 of the Fourth Schedule (WMA, 1996).

This report deals with the above specific requests and also highlights other significant changes to waste licence number 39-1.

Name of Applicant	IPODEC Ireland Limited
Facility Name(s)	IPODEC Ireland Limited
Facility Address	Ballymount Cross, Tallaght, Dublin 24
Description of Principal Activity	Repackaging of waste prior to dispatch for disposal
Quantity of waste (tpa)	150,000
Environmental Impact Statement Required	Yes
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)	28/3/2000		30/3/2000
Article 14 (2) (a)	12/4/2000		
Article 16	28/3/2000		17/4/2000

Applicant Address	Ballymount Cross, Tallaght, Dublin 24
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Planning Permission Status and Date Granted (if appropriate)	S94A/0203; granted 19/8/1994
Planning Authority	South Dublin County Council
Current Waste Licence Register Number	39-1, granted 25/11/1999
Date Review Application received	22/12/1999
Confidential Information Submitted	No
Location of Planning Documents in Application	Appendix 1, Volume 2 of EIS
Location of EIS in Application	Volumes 1 and 2.

SITE VISITS:

DATE	PURPOSE	PERSONNEL	OBSERVATIONS
21/1/00	Check site notice.	Eamonn Merriman	Site notice complied with Articles 5 and 7 of the Waste Management (Licensing) Regulations, 1997.

(2) Class/Classes of Activity

Class Description:

The descriptions provided by the applicant for these activities are set out below;

Third Schedule

Class 11: This class has been requested by the applicant in the review application merely as an adjunct to Class 12 of the Third Schedule. There are no actual new waste types or waste processes planned which require the addition of this class. It merely reflects the fact that different loads of waste being transferred for disposal are mixed together either on the floor of the Transfer Building or within the vehicles used to transfer the waste to disposal facilities.

Class 12: This is the principal activity. As per licence number 39-1, this refers to the transfer of non-recoverable waste into large ejector trailers for transfer to disposal facilities.

Class 13: As per licence number 39-1, this refers to the temporary storage of non-recoverable wastes prior to dispatch to disposal facilities.

Fourth Schedule

Class 2: As per licence number 39-1, 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: As per licence number 39-1, this refers to the recovery and temporary storage of metals separated from waste accepted at the facility.

Class 4: As per licence number 39-1, this refers to possible future recovery and temporary storage of construction and demolition wastes.

Class 13: This class has been requested by the applicant in the review application merely as an adjunct to Classes 2, 3 and 4 of the Fourth Schedule. It relates to the temporary storage of recovered waste pending their dispatch from the facility.

(3) Facility Location

Plans showing the location of the facility to which the application relates and the general layout of the facility are provided in Appendix 1.

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 located on Upper Ballymount Road within 250 metres of the facility. Otherwise buildings in the vicinity consist of factories and warehouses.

(4) Waste Types and Quantities

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

YEAR	NON-HAZARDOUS WASTE (tpa)	HAZARDOUS WASTE (tpa)	TOTAL ANNUAL QUANTITY OF WASTE (tpa)
1997	36,000	0	36,000
1998	59,000	0	59,000
1999	87,000	0	87,000
2000	120,000 ^{Note 1}	0	120,000
2001	130,000 ^{Note 1}	0	130,000
2002	140,000 ^{Note 1}	0	140,000

Note 1: Predicted quantities in application.

(5) Facility Design

- **Infrastructure**

The facility, with an area of 11,884 m², has three main components; a waste Transfer Building, a Garage and an Office Block. All waste handling occurs within the Transfer Building.

(6) Facility Operation/Management

- **Waste Acceptance Procedures**

The majority of waste that is accepted is commercial. Approximately 30% of the waste stream is domestic. Minor quantities of C&D waste are accepted. Conditions 3.13 and 3.14 have been altered to require the licensee to record European Waste Catalogue codes for wastes received at and dispatched from the facility.

Condition 5.4 increases the annual intake limit from 50,000 to 150,000. The facility is capable of the increased tonnages applied for. The applicant argues that with a 24-hour operation and the advent of more night-time waste collections, the waste will arrive at the facility more evenly throughout the day. Condition 1.5 will allow the Agency to restrict waste intake if the increased waste loading leads to emission and/or nuisance problems arising.

- **Waste Handling**

Condition 5.12 restricts night-time activities to receiving waste from skips, refuse collection trucks etc. at the facility and depositing it on the floor of the Transfer Station. A front-end loader will then manoeuvre the waste into temporary storage piles. Night-time is defined in the Interpretation as 2200 to 0800 hours. The following morning this waste will then be transferred to ejection trailers for dispatch to appropriate facilities.

Currently only cardboard and minor quantities of wood and metal are recovered. In 1998 506 tonnes (0.8% of total through put) were recovered, while in 1999 464 tonnes (0.7% of total through put) were recovered. Condition 5.13 requires a proposal for the recovery of appropriate components of the waste stream. The specific targets for C&D waste set forth in the policy statement "Waste Management, Changing Our Ways" (DoELG 1998) have now been incorporated into this condition. In order to facilitate 24 hour operation, conditions relating to the temporary storage of waste have been adopted accordingly. Waste for disposal can now be stored outdoors, subject to the requirements of Condition 5.9.

- **Nuisance Control**

Conditions 6.1, 6.4 and 6.5 will ensure that waste handling does not give rise to nuisance at the facility.

- **Hours of Operation**

The applicant wishes to process waste 24 hours a day, 7 days a week. Reasons argued are, inter alia, traffic gridlock, Gardai prohibition on City Centre refuse collection during 'rush hour', no daytime access to Temple Bar for refuse collection and customer demand. The facility is currently operating night-time waste transfers in non-compliance with Condition 5.11 of waste licence number 39-1. The night transfer as a percentage of total quantity transferred increased from 14.8% in 1998 to 28.95% in 1999. Additionally, waste for disposal collected at the civic waste facility in the nearby Ballymount Baling Station (licence number 3-2) is transferred to this facility over the weekend. These night-time and weekend operations in effect mean that the licensee has been operating in breach of Condition 5.11 of licence number 39-1. Condition 5.11 of the Proposed Decision number 39-1 was objected to at the time by IPODEC. However, the objection was rejected by a Technical Committee on the grounds that the working hours and working week conditioned in PD39-1 were those applied for by IPODEC. IPODEC subsequently applied for a review of the licence issued. Following consideration of the review application, Condition 5.11.2 has been amended to allow

for the unloading and temporary storage of waste received 24 hours a day, seven days a week (Note: Condition 5.12 restricts the type of waste handling that can occur at night-time). However, Condition 5.11.1 stipulates that these extended hours shall not apply until the Agency agrees that the surface water emissions limits (Schedule F, Table F.4) are being complied with (refer to Section 12 of this report).

(7) Restoration and Aftercare

No changes required.

(8) Emissions to Air

Dust/Odour: Condition 6.10 implements a proposal agreed through licence number 39-1 to control dust and odours. Condition 4.14 provides for the installation of a 'fog system' in the Transfer Building which will abate dust and odour emissions. Dust monitoring requirements (Table E.2.2) have been altered to reflect current standard practice. Condition 6.3 now requires the maintenance of dust curtains at the entry/exit points of the Transfer Building and Loading Bay. Condition 6.4 requires that the hardstanding yard be maintained in a clean state. This will reduce fugitive dust emissions from that source.

(9) Emissions to Groundwater

No changes required.

(10) 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 and close to the M50 motorway. There are some private residences (sensitive noise receptors) located on Upper Ballymount Road. The results of three daytime noise surveys indicate that traffic on the Ballymount Road is primarily responsible for high noise levels, both at the sensitive receptors and the site boundaries (the nearest sensitive receptor, located almost directly across the road from the facility entrance, was monitored in all the surveys).

As part of the EIS, another survey was undertaken over a 24 hour period. It was concluded that noise levels at the monitored noise sensitive location are mainly governed by traffic, but that dumping of waste in the Transfer Building may be audible at the monitored noise sensitive location during lulls in traffic. However, this survey demonstrated that the increase in traffic associated with night-time operation of the facility would have a relatively small impact on noise levels at the monitored noise sensitive receptor. The report concluded that during the noise survey, IPODEC was not a significant contributor to noise levels at that location. Additionally, as of 30/5/2000, no complaints relating to noise emanating from the facility have been lodged. Condition 5.12 restricts the night-time activity to the depositing of waste on the Transfer Station floor.

Control of noise emissions through nuisance avoidance (Conditions 7.2 and 7.3) rather than through specific emission limits is proposed (the standard noise emission limit

values of 55dB(A) for daytime and 45dB(A) for nighttime are exceeded regardless of the operation of the facility). Condition 4.3.1 requires that a perimeter hedge is maintained, thus facilitating noise attenuation. Annual monitoring at three site boundary locations and the previously monitored sensitive receptor will be undertaken (Schedule E.3: Noise) both during daytime and night-time hours.

(11) Emissions to Sewer

The conditions required by the sanitary authority have been applied to the discharge to foul sewer from this facility.

(12) Emissions to Surface Waters

The quality of surface water discharges from the facility have been poor, as the monitoring returns for licence 39-1 have demonstrated. In light of the ongoing poor quality of the surface water discharge, Table F.4 of Schedule F: Emission Limits sets emission limit values (ELV's) for this discharge. However, this problem should be addressed with the implementation of infrastructure requirements in the coming months. These improvements have been carried over from licence number 39-1 and, additionally, the proposed decision requires treatment of surface water run-off from the office car park and weighbridge area (Condition 4.23), while Condition 6.4 requires that the yard area of the facility is maintained in a tidy and mud-free manner. However, some of the infrastructure changes, which should have occurred within six months of the grant of licence number 39-1, have not yet been implemented. Consequently, the licensee was instructed on the 29/5/2000 to cease using the vehicle wash area until improvements agreed on the 3/3/2000 by the Agency have been implemented. Condition 5.11 also stipulates that until these ELV's are being complied with, the facility shall only operate during the hours licenced by licence number 39-1. These new requirements will assist improvement of the quality of surface water run-off to the receiving watercourse.

(13) Other Significant Environmental Impacts of the Development

An EIS, submitted as part of the application, was considered to be compliant with the regulations.

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

Signed _____

Dated:

Name Eamonn Merriman

APPENDIX 1

LOCATION PLAN

1. Site Location Plan, Figure B.2.b.
2. Site Boundary Map, Figure B.2.a.