

INSPECTORS REPORT
WASTE LICENCE REGISTER NUMBER 82-1

(1) Summary:

The facility is located on the Dock Road, Limerick (on main N69 road Limerick to Foynes Road). Approximately 50,000 tonnes per annum of commercial, industrial and domestic non-hazardous wastes are accepted at present at the facility, with capacity to handle 75,000 tonnes per annum in the improved infrastructure planned. At present most of the waste is repackaged into large containers for transport to landfill. Timber pallets, metal wastes and glass bottles are segregated from incoming wastes. The applicant intends to expand the activities to include dedicated areas for trial composting, paper, cardboard and plastic segregation.

Name of Applicant	Cussen & Co. (Crane Hire) Ltd.
Facility Name (s)	Cussen & Co. (Crane Hire) Ltd.
Facility Address	Dock Road, Limerick
Description of Principal Activity	Transfer Station
Quantity of waste (tpa)	75,000 (max)
Environmental Impact Statement Required	Yes – Included as stand alone document with application
Number of Submissions Received	Two
INSPECTOR'S RECOMMENDATION	The draft 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)	22/1/99, 3/6/99, 8/9/99		7/4/99, 1/9/99, 10/9/99, 3/11/99
Article 14 (2) (a)	4/2/00		
Article 16	Not applicable		

Applicant Address	Dock Road, Limerick
Planning Permission status and date granted (if appropriate)	An Bord Pleanala permission granted on the 24 th February 2000 (Ref PL 13.110811)
Planning Authority	Limerick County Council
Is the facility an existing facility:	No
Prescribed date for application:	1 st May 1997
Date Application received:	11 th November 1998
Confidential Information Submitted	Yes – Board Decision on 17/1/00. Business Plan held as confidential. The audited accounts were returned to applicant as the abridged accounts (received on 3/11/99) contained the information needed to make a decision on the application
Location of Planning Documents in Application	Attachment B.3

FACILITY VISITS:

DATE	PURPOSE	PERSONNEL	OBSERVATIONS
1/10/98	Site visit	T O Mahony	Visit Site and discussions with applicant.
20/5/99	Site Visit and meeting with applicant	B Donlon , T O Mahony	Visit Site and verify new site notice compliant with regulations. ^{Note 1}
10/3/00	Site Visit and meeting with applicant	B Donlon	Visit site to confirm current status prior to the issuing of the draft PD.

Note 1: Upon examination of the application, an EIS was required to be submitted.

(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.	X	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.	P	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.	X

Class description:

Third Schedule

Class 12: This refers to the transfer of non-recoverable waste into large articulated vehicles 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 composting of waste at the facility.

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

Class 4: This refers to the segregation of glass bottles on site. It also refers to possible future recovery and temporary storage of construction and demolition wastes.

Class 13: This refers to the storage of materials on site prior to recovery at the facility or removal to a recovery facility off-site.

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 draft 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 the Dock Road, Limerick (on main N69 road Limerick to Foynes Road). This is an area dominated by industrial - commercial buildings. It is bounded to the east by Ballinacurra Creek, to the south by the N-69, to the west by commercial properties and to the north and north-west by agricultural land. The Local Authority Sewage Treatment plant is presently under construction on a portion of the adjoining agricultural land within 80 metres of the facility. There are no residential properties in the immediate area. The eastern part of the facility is adjacent to the lower River Shannon SAC, site code 2165.

(4) Waste Types and Quantities

It was estimated that 48,000 tonnes of non-hazardous waste were to be accepted at the facility in 1999. There will be no hazardous waste accepted at the facility. The applicant requested that they be allowed to handle 75,000 tonnes per annum and this is the quantity allowed under the draft PD. However, it should be noted that Condition 1 (2nd Schedule) of the planning permission from An Bord Pleanala (granted 23/2/00) “limits the quantity of material to be imported into the site to 50,000 tonnes per

annum”.

(5) Activity Summary

This facility operates as a waste transfer station at present. Commercial, industrial and domestic non-hazardous wastes are accepted. At present most of the waste is repackaged into large containers for transport to landfill. Timber pallets, metal wastes and glass bottles are segregated from incoming wastes. The applicant intends to expand the activities to include dedicated areas for trial composting, paper, cardboard and plastic segregation.

(6) Facility Operation/Management

- **Waste Acceptance Procedures**

Conditions 5.1 and 5.2 specify the waste types acceptable at the facility. Hazardous waste is not acceptable at the facility. Condition 3.10 specifies the record that must be maintained for each load of waste arriving at and being removed from the site.

- **Waste Handling**

Refuse collection vehicles enter the facility from the public roadway and pass through the automatic security gates to the weighbridge where they are weighed. The waste is deposited on the floor of the reception and transfer building for segregation. The non-recycled waste is loaded onto trailers in the loading bay by means of a mechanical shovel. The material sent for recycling is baled and stored in preparation for transferral and further processing. All injector trailers and refuse collection vehicles enter the public roadway via the wheelwash and weighbridge.

Waste destined for landfill, recovered and rejected materials are recorded (weight, destination, nature, etc.) prior to dispatch from the facility (Condition 3.10). Waste must only be accepted at the facility from known customers or new customers subject to initial waste characterisation off-site (Condition 5.3).

- **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 and Condition 6.1 requires all compacted waste to be removed from the facility within 48 hours of being compacted.

A specialist vermin control company is contracted to control vermin on an ongoing basis. Conditions 6.3 and 6.4 will control litter generation at the facility.

An odour assessment (Condition 6.9) is required within four months from the date of the licence to provide for the control of odour nuisance. In addition there shall be weekly inspections for odour nuisance (Condition 6.2).

Currently, approximately half of the site is concreted. However, all traffic movements on site will be on concrete surfaces within nine months of the date of grant of licence (Condition 4.4.2). 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 mud/waste deposition due to vehicles exiting the site.

Dust emissions from waste handling activities within the Transfer Building and fugitive dust emissions from on-site traffic are the main dust emission sources. Three locations were monitored at the boundary of the facility on three consecutive months and all sites were well below the TA Luft Dust deposition limits of 0.35 g/m²/d.

The site is connected to a mains supply and the transfer building will be protected from fire by a sprinkler system. Condition 10.5 requires the applicant to submit a risk assessment and a report on fire water retention facilities within six months of the date of grant of the licence.

- **Hours for Waste Acceptance**

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

Monday to Saturday from 7.30 until 20.00.

(7) Facility Design

The facility will be located on a site which also presently accommodates the following associated companies: Auto Diesel Services Ltd., Auto Shafts Ltd. & Trucker Sales Ltd.

- **Infrastructure;**

At present there is an uncovered area for waste handling operations with temporary litter netting. In addition other areas within the facility are used for waste recovery operations (timber, metal, paper, glass).

Planning permission has recently been granted by An Bord Pleanála(24/2/00) for upgrading of the existing waste handling facilities to provide for a storage building, separation compound and other site works. The timeframe for the installation of these is outlined in Condition 4 of the draft proposed decision.

The waste management area will be bounded on 2 sides by a 4 to 5 metre wide open drain and on the other side by a 2.3m high security fence. There is a 24 hour security presence provided by Mid West Securities Ltd. complete with a Closed Circuit Television Monitoring System.

The following items of plant are in place at present: weighbridge, enclosed wood pulping shredding machine. The following items of plant will be introduced on a phased basis on commencement of operation of the upgraded facility: one baling machine, glass bottle crusher, paper shredder, trommel.

(8) Restoration and Aftercare

The applicant states that this is primarily a waste transfer operation and that the bulk of material is transferred on a daily basis. They propose to adapt the buildings for other uses in the event of decommissioning and to lodge a bond of appropriate value to cover decommissioning costs.

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 any clean-ups 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

Diesel used for mobile plant and machinery is stored in two bunded 13,638 litre tanks. Vehicles are fuelled by two dispensing pumps located at these tanks. No testing has been carried out on the bund walls to date but the applicant has stated that they will perform testing within 6 months and at three yearly intervals thereafter. This is required in Condition 4.13.6. Drainage from the fuel dispensing area, unless contained within the bund, is directed through an oil separator (Condition 4.13.1). Condition 10.2 specifies the provision of spill abatement material.

The site has been filled over a number of years with a variety of waste materials and is partially concreted over at present. Condition 4.18 requires the licensee to carry out a comprehensive hydrogeological investigation of the site within six months of grant of this licence and to implement any recommendations arising from this investigation.

Condition 4.4.2 requires an extension of the impermeable surface for truck movements and parking in order to protect groundwater from indirect fuel and oil discharges and run-off will discharge to surface water via an oil separator. This shall be installed within nine months of the date of grant of licence.

Sewage will be treated using a Klargester Biodisc system to 20 mg/l BOD and 30 mg/l SS prior to percolation to groundwater. Condition 7.4 requires that the percolation system be designed and certified by a qualified engineer to meet the requirements of SR6 or any future guidance from the Agency.

(10) Emissions to Air

The potential emissions to air at this site are dust from the transfer and shredding operations and fugitive dust from on-site traffic. Dust will be controlled under Condition 6.7 of the draft PD with the dust deposition limit given in Schedule G.

(11) Noise Emissions

The sources of noise emissions are likely to be site traffic a bulldozer, an excavator, cardboard compactor/baler, shredder. The tipping and loading operation will take place, within three months, within the enclosed storage/reception building. The roof and side sheeting of this building will be of a double skin insulated cladding which will help reduce noise levels.

Noise monitoring at the facility boundary indicated that there were exceedances of noise guidelines but examination of the L90 values indicated that this was due to traffic noise. Annual noise monitoring is required at the locations outlined in Schedule F.5 while noise emission limits are included in Schedule G.4.

(12) Emissions to Sewer

There are no emissions to sewer at present. Upon completion of the Limerick Main Drainage Scheme foul water shall be discharged from the facility using a foul sewer connection. Consent for such a discharge shall be in accordance with the requirements of the Sanitary Authority (Condition 7.5.3). However, limits are included under Schedule G.2 of the draft PD in accordance with the limits set by the Sanitary Authority for a nearby proposed transfer station (Reg No. 51-1).

(13) Emissions to Surface Water

There is presently one oil interceptor that receives the run off from the existing concreted area and the licensee is required to test its performance within three months and replace it if necessary (Condition 4.17.1).

In addition, the applicant stated that they intend to install a new oil interceptor to collect run-off from remaining yard area that will conform to European Standard prEN - 858.

(14) Other Significant Environmental Impacts of the Development

The wash water from the transfer building and the run-off from the compost area are collected in dedicated holding tanks which have been fitted with high level alarms. The applicant has stated that these foul waters will be taken by SES Ltd for treatment at their facility in Co. Clare. These foul waters may be discharged as described under “Section 12: Emissions to Sewer” outlined above.

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

A Draft Waste Regional Plan for Counties Limerick, Clare and Kerry was published in November 1999. This makes reference to an existing privately operated waste transfer station on the Dock Road, Limerick.

(16) Submissions/Complaints

There were two submissions made in respect of this application and these are dealt with as follows.

- ***Mid-Western Health Board (received 28th February 2000)***

It stated that following a complaint received concerning the condition of the site and a subsequent site inspection in December 1996, they recommended to Limerick County Council to have a Section 110 nuisance abatement notice under the Local Government (Sanitary Services) Acts 1878 to 1964 served on the company in order to have the accumulation of refuse removed from the site. A notice under the Rats and Mice Destruction Act 1919 was also served at that time.

Subsequent site inspections by the Environmental Health Dept have indicated that the physical layout has greatly improved and littering of the site was not evident at the time of inspection (Feb 15th 2000). However, a large accumulation of waste (40m x 15m x 5m) was observed on that day and the company stated that this was due to the Gortadroma landfill site being closed due to high winds.

The submission gave an overview of the application on hand. It states that the applicant be requested to clarify the following before they could give their support to the application:

1. Details of proposed locations for non-recyclable waste and contingency plans in the event of inability to dispose of waste within a specified period;
2. Details on odour control for the proposed activity to be submitted for examination;
3. Additional dust suppression measures;
4. Details of projected noise levels internal and external to the facility;
5. Due to poor subsoil that the applicants be requested to provide a raised percolation bed for disposal of the effluent.

Response:

1. Details on the proposed locations for all waste and foul water leaving the site are required under Conditions 3.10, 3.12, 3.13 and 5.15. Condition 5.12 prohibits the overnight storage of wastes other than in designated storage areas or in fully sealed containers within two months of date of grant of the licence. All waste must be compacted within 12 hours of acceptance at the facility (Condition 5.8) and must be removed from the facility within 48 hours (Condition 6.1) and a procedure for management/handling of all wastes is required under Condition 5.7

2. An odour assessment programme is required under Condition 6.9 of the draft proposed decision.

3. Measures to control dust nuisance are covered in Conditions 6.7. Emission limit values of 350mg/m²/d are set at the facility boundary. Daily inspections for dust nuisance and compliance monitoring three times yearly are required.

4. Noise monitoring at the facility boundary indicated that there were exceedances of noise guidelines but examination of the L90 values indicated that this was due to traffic noise. Annual noise monitoring is required at the locations outlined in Schedule F.5 while noise emission limits are set in Schedule G.4.

5. At present sewage effluent is treated in an existing septic tank and percolation area. However, the applicant proposes to provide a proprietary treatment plant on-site with sub-surface percolation of final effluent. Condition 7.4 requires that the percolation system be designed and certified by a qualified engineer to meet the requirements of SR6 or other guidance provided by the Agency.

• ***Limerick County Council (received 2nd March 2000)***

1. The site has been the source of numerous complaints regarding nuisance and public health issues in the past. They also stated that a notice under the Public Health (Ireland) Act, 1878 was issued to the company in December 1996 regarding the accumulation of refuse on site.

They note that they have difficulties in getting the applicant to comply with planning permissions.

Response:

See response to item 1 in the submission from the Health Board above.

Matters relating to compliance with planning are for Limerick County Council themselves to deal with.

2. The submission states that the lands were reclaimed primarily with building and construction materials but also with other material such as vehicle parts which were evident inside the Ballincurra Creek embankment. They are concerned with leachate from the site entering the nearby water courses and recommend that the filled areas of the site be fully investigated.

Response:

Condition 4.18 requires the licensee to carry out a comprehensive hydrogeological investigation of the site within six months of grant of this licence and to implement any recommendations arising from this investigation.

Signed: _____

Dated: _____

Brian Donlon, Inspector I,
Environmental Management and Planning.

APPENDIX 1

LOCATION PLANS

