

INSPECTORS REPORT

WASTE LICENCE REGISTER NUMBER

(1) Summary:

The facility is a licensed waste transfer station located on the Dock Road in Limerick, close to Limerick City. The original licensee was Cussen & Co. (Crane Hire) Ltd but the licence was transferred to Ipodec (Ireland) Ltd in April 2002.

Name of Applicant	Ipodec (Ireland) Ltd
Facility Name (s)	Ipodec (Ireland) Ltd Waste Transfer Station, Dock Road, Limerick
Quantity of waste (tpa)	90,000
Environmental Impact Statement Required	No
Number of Submissions Received	1
Inspector's Recommendation	That the licence be granted subject to conditions

(2) Activity Summary

The licensee accepts waste from households, commercial and industrial customers and also deals with a small overall percentage of construction and demolition waste. The classes of activity as per the Third and Fourth Schedules of the Waste Management Act (the Act) applied for in this review application are the same classes of activity as are referred to in the existing licence. In the review application the licensee does not propose to carry out composting at the facility, which is referred to in the existing licence. Class 2 of the 4th Schedule of the Act is still included in the list of licensed waste activities, as it refers to the recovery of certain organic wastes such as cardboard and wood. Another proposed change to the waste activities is the installation of a picking line in the extension to the transfer building for the separation of dry recyclables. This could potentially result in a significant increase in the levels of recycling, which have traditionally been low at this facility (approximately 6.8% per annum).

(3) Facility Location

The facility is located on the Dock Road, close to Limerick city centre in an industrial, non-residential area.

(4) Waste Types and Quantities

The existing licence allows the acceptance of 75,000tpa of waste at the facility. The review application proposes an increase to 90,000tpa. This increase is below the E.I.A threshold and it is my opinion that the licensee will be capable of dealing with this tonnage. The existing licence prescribes maximum annual tonnage limits for three waste categories i.e.: commercial and household waste, construction and demolition waste (C+D), and Industrial non-hazardous waste. For the reviewed licence the licensee proposes just two waste categories: C+D, which comprises only 5% of the total tonnage amount and 'non-hazardous solid waste' which would allow for the remaining categories. It is my opinion however that for the purposes of national reporting, the categories of waste and the relevant tonnages should be as specified in Schedule A. The proposed PD allows for the total tonnage allotted to each waste category to be changed, subject to the agreement of the Agency (see Schedule A).

(5) Facility Design

Infrastructure: Changes to facility boundary

The revised facility boundary proposed by the licensee includes a new wedge-shaped area of land to the Northeast of the facility, as well as an area to include the new facility offices which have been built and are already in use. It would also result in the exclusion of some office space which is now solely used by Cussen & Co. Crane Hire Ltd and, importantly it would result in the exclusion of an area of contaminated land. See Appendix 1 for a drawing showing the 'Existing facility boundary' (Drawing No. C98-101-B2-01) and Appendix 2 for the facility boundary proposed by the applicant (Drawing No. C98-101-B2-01 Rev.2).

Issues arise with regard to the excluded area and conditions of the licence must cover any relevant legal requirements. This issue is further discussed under the heading 'Hydrogeology' below.

Waste Water treatment

The licensee has been required by the Agency in a notice of non-compliance (82-1NC03MMcH), dated 03/05/01 to tanker all foul sewer discharges offsite for treatment because the appropriate on-site wastewater treatment infrastructure was not in place. The licensee states that following the completion of the Limerick Main Drainage Scheme the foul water and sewage arising on-site will be discharged to the treatment plant directly.

The licensee proposes to divert vehicle wash wastewater and foul water from the transfer building to a grit trap/solids separator, via a full retention Class 1 interceptor to a sand filter percolation area. In other words there is no proposal for the use of an on-site treatment system. This is not an appropriate proposal, in my opinion.

Condition 5.6 of the PD provides for the direct discharge to sewer of effluent once the Limerick Main Drainage Scheme treatment plant is completed. Prior to this the licensee has the option to (1) install and use an on-site wastewater treatment plant, as per the requirements of Condition 3.10 or (2) collect all waste water and sewage and tanker it offsite to an appropriate treatment facility.

Materials Recovery/Recycling

One of the purposes of the review application is to allow for the extension of the existing waste transfer building, for which planning permission has been received (see Drawing No. C98-101-B2-01-Rev 2). The existing transfer building will be used as the recycling area of the facility with a baler and a conveyor system/picking line for the separation of dry recyclables.

Dust and Noise Monitoring Locations

As part of the enforcement of the existing licence the licensee in July 2002 requested to change the location of 2 monitoring points – dust monitoring location DM3 and noise monitoring location NI3. The relocation of the noise monitoring location to the Southeast of facility was considered appropriate but the relocation of the dust monitoring location to the Northwest of the facility was not considered appropriate as it would leave the downwind side of the facility without a dust monitoring point. The Agency required therefore that the dust monitoring point DM3 be situated at the most north-easterly point of the facility.

As part of the review application the licensee has again requested the same changes to monitoring locations. My opinion remains as outlined above.

(6) Facility Operation/Management

The existing licence (82-1) requires that the floor of the transfer building is cleared of waste at the end of the working day and that no waste shall be stored overnight at the facility other than in designated secure storage areas. The licensee has expressed difficulty with complying with these conditions and cited the closure of Gortadroma landfill during adverse weather conditions and on Saturdays as a reason. The recommended Proposed Decision therefore allows storage of waste generally for forty eight hours and seventy two hours in case of the closure of the landfill, subject to additional record-keeping requirements for loads of waste stored for longer than forty eight hours.

• Waste Acceptance/Handling Procedures

For the reasons listed above the licensee feels that it will not be possible to clear the floor of the transfer building each night. The licensee therefore proposes to store any waste remaining (i.e. waste that will not be transferred on that day) in the waste transfer section of the proposed MRF stating that it considers this area to be a 'secure

storage area'. Condition 5.3 of the PD allows overnight storage of unprocessed waste at the end of the day but requires that it is processed at the start of the following working day. The construction of the 'secure storage area' is included in the schedule of Specified Engineering Works (Schedule B).

Materials Recovery/Recycling

The licensee proposes to install a materials recovery/recycling facility to increase the recycling rate at the facility.

- **Nuisance Control**

Nuisances caused by the operation of the facility are controlled by Conditions 6.2 and 7 of the recommended Proposed Decision.

- **Hours of Waste Acceptance/Removal**

The licensee proposes to change the hours of operation and waste acceptance at the facility from 7.30 to 20.00 Monday to Saturday inclusive to 24 hours per day, seven days per week. The licensee does not anticipate that large quantities of waste will be accepted outside of the current operational hours but that it may be necessary to provide night-time collections for some clients. Condition 1.7 controls the hours of waste acceptance and removal at the facility.

(7) Restoration and Aftercare

The Restoration and Aftercare of the facility is controlled by Condition 4.

(8) Hydrogeology

- **Hydrogeology**

Groundwater Monitoring Locations

When the licence was granted (May '02) waste activities and fuel storage etc. had been carried out for some time and much of the site was not surfaced with impervious. Condition 4.18 of the existing licence therefore required the licensee to carry out a hydrogeological investigation of the site. This investigation was carried out in two stages. Firstly window sampling (at 14 locations) of the soils underlying the site was carried out and the results indicated localised areas (4 of the 14 locations) of contamination with petroleum hydrocarbon compounds. These contaminated areas were in were at the skip storage area, the waste transfer area and the diesel storage area. Diesel range hydrocarbon concentrations of >1,000mg/kg (up to 13,000mg/kg) were observed but were mostly observed at shallow depths with the exception of the diesel storage area where diesel odours were observed at depths of up to 3m within silt and gravel deposits.

Based on the results of the first part of the investigation the installation of three groundwater monitoring boreholes was recommended. The boreholes were installed and the results of groundwater monitoring showed that the concentration of diesel

range organics in the monitoring borehole (GMB3) near the diesel storage area were 1.67mg/l, which exceeds the Dutch Intervention Value for Mineral Oil (0.6mg/l). In the other boreholes the Dutch Intervention Value was not exceeded.

The facility boundary proposed by the applicant excludes the old diesel storage area (GMB3). When the licence was transferred to the current licensee from Co. Crane Hire Ltd in April '02 the current licensee accepted the requirements of S.47(6) of the Waste Management Act, 1996 i.e. that 'a person to whom a licence is transferred under this section shall be deemed to have assumed and accepted all liabilities, requirements and obligations provided for or arising under the licence, regardless of how and in what period, including a period prior to the licence, they may arise'. This being the case it is my opinion that the area shown in green in Drawing No. C98-101-B2-01 should remain within the facility boundary until such time as the agreement of the Agency has been granted, subject to the licensee having carried out any such works as required by the Agency. In conclusion the facility boundary will therefore be a composite of the facility boundary proposed by the applicant (in Drawing No. C98-101-B2-01 Rev.2) and including the area shown in green in Drawing No. C98-101-B2-01 unless otherwise agreed with the Agency.

(9) Emissions to Air/Water/Sewer

Condition 6 of the PD specifically addresses emissions. In addition sewage and surface water management are controlled by Conditions 3.10 and 5.6 of the PD.

(10) Other Significant Environmental Impacts of the Development

The facility is adjacent to the Lower River Shannon SAC, site code 2165. If the facility is operated in accordance with the conditions of the licence emissions from the facility should not have an impact on this watercourse.

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

Air Quality Management Plan

None

Water Quality Management Plan

A 'Water Quality Management Plan for the Lower Shannon Catchment' was published in 1990.

Waste Management Plan

The relevant Plan is the Waste Management Plan for Limerick/Clare/Kerry Region, adopted September 2001. The plan identifies the need for a regional approach to waste management and the benefits of partnership between Local Authorities and the private sector.

(12) Compliance History

From the date of grant of the licence the original licensee's state of compliance was very poor with regard to the infrastructural, reporting and other requirements of the licence. The current licensee purchased the business and took over its operation and subsequently the licence was transferred to them. Significant improvements have been documented in inspection reports and audits since that time and the reviewed licence would allow better levels of compliance, for reasons outlined above.

(13) Submissions/Complaints

One submission was received from Dr. Kevin Kelleher, Director of Public Health at the Mid-Western Health Board within the appropriate timeframe. It was as follows:

The Board had no objection to the granting of the revised licence provided that a number of conditions are met: (1) The plant must be operated in such a manner as not to give rise to a statutory Public Health nuisance. (2) Measures must be taken to ensure that there is no significant increase in noise levels at adjacent noise sensitive locations from the operation of the plant. (3) Continuous measures for dust suppression must be employed at the waste handling facility. (4) Pest control and prevention measures must be continued at the facility and, if necessary an increased level of baiting and inspection employed. (5) All soiled surface water from the extended facility must be collected and removed offsite for final disposal or alternatively treated on site. (6) The Board is not in favour of the storage of refuse for a 68 hour period on site and would be concerned about the potential odour nuisances arising from such an arrangement. Such an arrangement could also provide greater attraction for rodents.

The licensee is responsible for complying with noise and dust emission limit values (ELVs) which are controlled by Schedule C of the recommended Proposed Decision. Nuisances are controlled by Conditions 6.2 and 7. Wastewater generated at the facility must be either collected and taken offsite for treatment or treated at the facility, as stated by the objector. The storage of waste for up to a maximum of 72 is permitted at the facility subject to the following requirements: these wastes loads will be subject to additional recording requirements and designated secure storage areas will have to be constructed in the waste transfer building and the specification of these areas will have to be agreed in advance with the Agency.

Signed _____
Maeve McHugh

Dated: _____
29 May 2003

Inspector, Environmental Management & Planning

APPENDIX 1
Drawing No. C98-101-B2-01

APPENDIX 2
Drawing No. C98-101-B2-01 Rev.2

