

INSPECTORS REPORT

WASTE LICENCE REGISTER NUMBER 95-1

Reduce, Reuse and Recycle Ltd., Transfer Station.

Recommendation: A Waste Licence with conditions be granted

(1) Introduction:

Wastes accepted at this facility include commercial, industrial and construction and demolition wastes. The facility has been operating as an unauthorised facility since mid 1997. Currently approximately 10,000 tonnes per annum are accepted at the facility, with a capacity to handle 17,000 tonnes in the future. All of the waste handling and processing is carried out inside the waste transfer building located at the facility. Most of the incoming wastes are bulked up, transferred into larger containers and transported to landfill for disposal. Waste cardboard, spent grain and scrap metal are recovered at the facility. The spent grain is generated at a local brewery is brought to the waste transfer station where it is stored inside the waste transfer building and subsequently conveyed directly to customers for use in Agriculture as animal feed.

The facility is located on Knockmitten lane in the Western Industrial Estate, Dublin 12. It is located in an industrial zoned area, and is surrounded by light industrial units. The nearest sensitive location is a private residence which is located approximately 30m from the boundary of the facility, while the Naas Rd. and the M50 Motorway are located within one kilometre of the facility. **A location plan showing the outline of the facility to which the application relates is provided in Appendix 1.**

Name of Applicant	Reduce, Reuse & Recycle Ltd.
Facility Name(s)	Waste Management Centre, Knockmitten Lane.
Facility Address	Knockmitten Lane, Western Industrial Estate, Dublin 12.
Description of Principal Activity	Non-Hazardous Transfer Station
Quantity of waste (tpa)	17,000 (maximum)
Date Application Received	1 st March 1999
Environmental Impact Statement Required	No
Number of Submissions Received	4

SITE VISITS:

DATE	PURPOSE	PERSONNEL	OBSERVATIONS
26/03/99	Site Notice Check	E. Merriman	Not Compliant

24/09/99	Site Notice Check	E. Merriman	Not Compliant
25/11/99	Site Notice Check	E. Merriman	Compliant
28/04/00	Familiarisation with facility	Kealan Reynolds	Site generally untidy

(2) Facility

The transfer of waste at the facility is carried out indoors and there is a tipping area where all wastes are initially inspected and subsequently removed by a front end loader into large ejection trailers at a designated loading bay. Cardboard wastes which are segregated at source are placed in a storage bay prior to baling on-site and baled cardboard is currently stored outside the transfer building. It is planned to install an additional tipping area at the facility for all incoming wastes and to install a mini MRF for the recovery of cardboard, paper, metals and plastics from the incoming wastes. There are designated storage areas in the transfer building for the storage of spent grain and scrap metals.

Condition 4.3 requires the applicant to install and maintain site security and fencing around the facility boundary. Condition 4.4 requires the applicant to provide and maintain an impermeable hardstanding area at the facility and all surface waters will be collected and discharged through a silt trap and interceptor. There is a weighbridge in place at the facility and the applicant is required to provide and maintain a waste quarantine area under Condition 4.8. Condition 5.4 requires the applicant to adopt detailed waste acceptance procedures and this will include ongoing vetting of customers, and off-site inspection of wastes at source. Historically waste acceptance records and procedures have been poor at the facility, with few records of waste types and quantities maintained.

A decommissioning and aftercare plan for the facility is required to be developed under Condition 8.1 of the Proposed Decision.

(3) 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)
1999	9,500	Not Applicable	9500
2000* ^{Note 1}	10,000	Not Applicable	10,000
2001* ^{Note 1}	13,800	Not Applicable	13,800
2002* ^{Note 1}	15,700	Not Applicable	15,700

*Note 1 – Predicted Quantities

The applicant recovered 650 tonnes of waste in 1999, and the percentage of wastes recovered at the facility is planned to increase over the next few years.

(4) Emissions to Air

- **Dust:**

Dust monitoring was carried out at the facility as part of the waste licence application and the levels of dust deposition measured suggest that dust emissions from the facility will not create a nuisance (43 – 57 mg/m²/day) beyond the site boundary. Condition 9 of the Proposed Decision provides for ongoing monitoring of dust emissions from the facility.

- **Odour:**

Potential nuisances from the facility are controlled by Condition 6 of the Proposed Decision. The applicant is required to process all wastes for disposal within 12 hours of its arrival on-site, all wastes for disposal shall be removed from the facility within 72 hours of its arrival on-site. In addition, the floor of the waste transfer building is required to be cleaned at the end of each working day.

- **Noise**

The proximity of major roads to the facility impacts on the noise levels at the facility. The primary noise sources from the facility are periodic truck movements and waste processing. The applicant is required to comply with daytime (55dBA) and night-time (45dBA) noise emission limits in addition to a requirement to monitor noise levels on an annual basis.

(5) Emissions to Groundwater

Condition 4 of the Proposed Decision requires the applicant to provide and maintain an impermeable hardstanding in all areas of the facility, while the applicant is required to test the integrity and water tightness of all underground pipes and tanks under condition 9.13

(6) Emissions to Surface Water

Surface water run-off from the facility is directed to a surface water course which drains to the north of the facility and discharges to the Cammock River. The Cammock River subsequently discharges to the River Liffey. Elevated suspended solids, ammonium, phosphate and COD have been recorded in surface water discharges from the facility. The installation of the surface water drainage system including silt trap and oil separator will see a significant improvement in surface water discharges from the facility.

The applicant is also required to comply with surface water emission limit values in addition to monitoring such discharges on a quarterly basis.

(7) Emissions to Sewer

Currently the only foul water infrastructure at the facility is a septic tank for the on-site toilet facilities. Condition 4.12 requires the applicant to provide foul water systems which will ensure collection of sewage from on-site toilets, washings from the floor of

the Transfer building and the vehicle wash area prior to discharge to sewer. All discharges to sewer shall pass through a silt trap and oil separator prior to discharge. The emission limit values and monitoring requirements for discharges to sewer reflect the details contained in the Section 52 response from South Dublin County Council. Monitoring of emissions to sewer is required by Condition 9.1.

(8) Other Significant Environmental Impacts

None

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

1. The Water Quality Management Plan for Dublin Bay notes that the River Cammock is supportive of fish life and while it recognises it is eutrophic it does not specify water quality objectives for this surface water system.
2. The Waste Management Plan for the Dublin Region does not discuss the individual private waste transfer stations operational in the Dublin area. However, it does state that the private sector plays a significant role in waste management in the region.

(10) Submissions/Complaints

Appendix 2 contains a list of all submissions received relating to the application. The dates received and the details of the individual, department, group or organisation making the submission are provided.

An overview of the submissions received in relation to the waste licence application is provided. This includes a summary of all issues raised in the submissions and shows how these issues are dealt with in the proposed decision.

Summary of Submissions/Complaints

4 submissions were received in relation to this application, and the grounds raised in these submissions are dealt with below.

Ground 1. *The applicant is operating the facility without full planning permission and the facility is located in an area designated for light industrial units and in close proximity to residential properties. Planning should not be granted to the applicant. Granting of such planning permission would lead to property devaluation in the area.*

Response:

The issue of planning permission and land use zoning is a matter for the planning authorities and is outside the scope of this Proposed Decision.

Ground 2. *The operation of the facility may lead to increased noise levels in the area, due to operations on-site and movement of traffic to and from the facility.*

Response:

Schedule F specifies noise limits to be complied with while Condition 9 of the Proposed Decision requires the applicant to carry out noise monitoring at locations to be agreed with the Agency. Condition 6 specifies a number of requirements in relation to the avoidance of environmental nuisances.

Ground 3. *Odours may create a nuisance in the vicinity of the facility, these odours would be generated due to the acceptance of “wet wastes” and spills of wastes along the roads adjacent to the facility.*

Response:

Condition 5.1 of the Proposed Decision specifies that no liquid wastes shall be accepted at the facility while compliance with Condition 5 will ensure that wastes are handled and processed in a manner which will minimise odour generation. Potential nuisances are controlled by Condition 6 of the Proposed Decision.

Ground 4. *Due to the increased traffic in the area of the facility, there may be a significant increase in the level of dust emissions from the facility.*

Response:

The applicant is required to provide a hardstanding area at the facility and the application of water during dry weather will minimise air borne dust nuisances from the facility. Schedule F sets out emission limit values for dust deposition.

Ground 5. *Health risks may be caused due to the nature of wastes being accepted at the facility, and hazardous wastes, liquid wastes, etc. may be accepted at the facility, thus creating risks to health and the environment.*

Response:

The Proposed Decision prohibits the acceptance of hazardous and liquid wastes at the facility. Condition 5 sets out waste types to be accepted and ensures that wastes are accepted and handled in an appropriate manner.

Ground 6. *The waste transfer facility will lead to increased volumes of traffic in the Knockmitten lane area and this is not satisfactory in an area which has residential properties.*

Response:

The issue of traffic outside the facility is a matter for the planning authorities and is outside the scope of this Proposed Decision.

Ground 7. *The operation of a waste facility in the Knockmitten Lane area would lead to increase in litter and deleterious material being strewn throughout the environs of the facility.*

Response:

The prevention of litter and debris collecting around the facility environs is controlled by Condition 6 of the Proposed Decision.

Ground 8. *Spillages from lorries carrying waste may occur in the area around the facility.*

Response:

See response to Ground 7.

Ground 9. *Waste which is accepted at the facility very early or late in the day may cause a nuisance to local residents.*

Response:

Condition 5.12 of the Proposed Decision specifies the times during which wastes may be accepted at the facility while potential nuisances are controlled by Condition 6 of the Proposed Decision.

Ground 10. *There may be an infestation of vermin and flies to the facility and the surrounding areas.*

Response:

Potential nuisances including vermin and flies are controlled by Condition 6 of the Proposed Decision.

Ground 11. *Activities at the facility may lead to water pollution*

Response:

Compliance with the conditions of the Proposed Decision will ensure there is no impact on the local surface water course. All waste waters shall be collected and discharged to sewer.

Ground 12. *A submission was received stating that there was no Environmental Impact Assessment completed for the facility.*

Response

The volume of waste to be accepted at the facility is less than 25,000 tonnes per annum and therefore an Environmental Impact Statement is not required under the regulations.

Signed _____

Dated:

Name Kealan Reynolds

APPENDIX 1
LOCATION PLAN & SITE LAYOUT MAP

APPENDIX 2

SUBMISSIONS