

INSPECTORS REPORT

Waste Licence Register Number: 136-2

Applicant: Greenstar Recycling (Munster) Ltd.

Facility: Sarsfieldcourt Industrial Estate, Sarsfieldcourt, Glanmire, Cork.

Inspector: Regina Campbell

Inspector's Recommendation: That a revised licence be granted subject to conditions.

(1) Introduction

This report relates to an application by Greenstar Recycling (Munster) Ltd. for a review of the existing waste licence for a non-hazardous waste transfer station (Reg. No. 136-1, issued on 26/07/01). The original licence was issued to Ahern Industrial Services Ltd. and this company was subsequently acquired by Greenstar Recycling Holdings Ltd. Ahern Industrial Services Ltd. now trades as Greenstar Recycling (Munster) Ltd. The construction of the transfer station is completed and waste acceptance commenced at the facility in July 2003. Further details on the infrastructure at the facility are given in Section 3 of this report.

The facility is located in an industrial estate approximately 8km northeast of Cork city and 5km north of Glanmire. The industrial estate has a mixture of industrial/commercial properties and the predominant landuse in the vicinity of the estate is agricultural pastureland. The nearest domestic residence is approximately 150m from the facility boundary with 18 residences within approximately 0.5km of the facility.

The current licence allows 52,860 tonnes of predominantly commercial and industrial waste to be accepted in Year 1 of operation rising to a maximum of 99,017 tonnes in Year 5 of operation. Small quantities of household (1.2%) and construction/demolition (0.8%) waste are also allowed to be accepted. At present an average of 1,600 tonnes per month of waste is accepted at the facility.

The principle amendments proposed in the review application to the existing waste licence (WL 136-2) are as follows:

1. A change in the Principal activity from Class 11 of the Third Schedule to Class 2 of the Fourth Schedule of the Waste Management Act (WMA).
2. The composting of 5000 tonnes of source separated biodegradable waste annually.
3. The inclusion of Class 12 of the Third Schedule of WMA.
4. The acceptance of increased volumes of household waste (up to 50% of the total volume accepted); to remove the annual incremental limits, and to provide flexibility in the quantities of the individual waste categories accepted (Condition 1.5 and Schedule A of WL 136-1).
5. To allow a reduction in the height of the perimeter wall from 3m (as specified in Condition 4.3.1 of WL136-1) to 2.5m.
6. Remove requirement for continuous monitoring of TOC on surface water emissions from the facility (Condition 9.1 and Schedule E of WL 136-1).

Section 2 of this report details the proposed amendments and the Inspector's recommendations.

The classes of activity applied for are as follows:

- Waste Disposal Activities – 3rd Schedule (Classes 11, 12 and 13); and
- Waste Recovery Activities – 4th Schedule (Classes 2, 3, 4 and 13).

The principal activity applied for is Class 2 of the 4th Schedule.
 The environmental impacts and associated mitigation measures at this facility were addressed in detail in the Inspector's report that accompanied the Proposed Decision for the existing Waste Licence 136-1.

Recommendation:

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

Appendix 1 contains a Site location map Drawing No. 3.1 and site layout Drawing No. 0304802-01 Rev. A.

Quantity of waste applied for	99,017 (as in Year 5 of operation of existing licence)
Date application received	06/05/03
EIS Required	No
Number of valid submissions received	None
Recent facility visit	17/10/03 (Regina Campbell)

(2) Amendments to the Existing Licence Requested

The applicant stated the following reasons for the licence review:

- 1. A change in the Principal activity to Class 2 of the Fourth Schedule.** The original application identified Class 11 of the Third Schedule as the Principal Activity. The applicant states that while treated waste from the facility will be disposed to landfill, the majority of the waste handled at the facility will be recovered or recycled (up to 70% of the waste accepted). The present licence limits the activities allowed under Class 2 of the Fourth Schedule to the recovery of cardboard, paper, wood and plastic. The applicant requests the inclusion of composting under this class of activity. I recommend that these changes be allowed. However Condition 1.7 of the recommended PD requires at least 50% of the waste handled at the facility to be recovered either on or off the facility.
- 2. The composting of 5000 tonnes of waste annually.** The applicant proposes to use the Celtic Composting System (CCS). They say that it is a proven technology already in use at other licensed facilities and they say that there is a need to significantly expand on the treatment and recovery rates of household waste in the Cork region such as the composting of the organic fraction.
 The CCS involves the use of a four-step process: i) feed stock preparation ii) in-vessel composting iii) aerated curing and iv) screening, storage and blending. The latter stage involves the use of a trommel to remove contaminants and oversized particles. The applicant proposed that the in-vessel composters, aerated curing piles would be located outdoors and that trommeling would also be undertaken outdoors. It is proposed to use biofilters to control and mitigate odour emissions from the in-vessel composters and from the aerated curing piles. Any leachate produced will be recirculated as part of the composting process. The entire process takes approximately 10-12 weeks. The final

product will be removed off-site for use in land reclamation or horticultural purposes subject to it meeting the required standard. Otherwise the applicant proposes that it will be used as landfill cover.

I recommend that in principal that composting be allowed at the facility. However Condition 3.14 requires the detailed design of the system including the positions of the composting units, the aerated curing pad and the trommel to be submitted to the Agency for agreement prior to start-up. I recommend that trommelling and all other composting operations, other than in-vessel composting, be undertaken within the transfer building (Condition 5.1) due to concerns about odour, dust and noise nuisance at neighbouring commercial and residential properties. In addition, Condition 8.9 requires the licensee to undertake an odour control programme at the facility on commencement of composting operations

3. **The inclusion of Class 12 of the Third Schedule.** The applicant proposes to segregate and bale non-recoverable waste, if required, prior to submission to an off-site residual landfill for disposal. Baling will be undertaken indoors at the facility (Condition 5.1).
4. **The acceptance of increased volumes of household waste (up to 50% of the total volume accepted); to remove the annual incremental limits and to provide flexibility in the quantities of the individual waste categories accepted (Condition 1.5 and Schedule A of WL 136-1).** The applicant does not propose to alter the types or overall volume of waste accepted at the facility from that set in the current licence. However it is applying to vary the quantities of each type of waste that can be accepted to allow up to 50% of the waste to comprise of household waste.

Greenstar is also applying to have the annual incremental limits set in the present licence removed to allow the maximum volume of waste to be accepted from the date of issue of the licence. The applicant states that the present licence sets incremental limits on the volumes of waste that can be accepted at the facility for the first five years of operation. However these limits were based on the information presented in the original waste licence application in March 2000 and reflect predictions of market conditions made at the time. Greenstar also want the flexibility to vary the volume of any one waste type while remaining within the overall total.

I recommend that these proposed amendments be allowed (see Schedule A of the recommended PD).

5. **To allow a reduction in the height of the perimeter wall from 3m (as specified in Condition 4.3.1 of WL136-1) to 2.5m.** The applicant stated that they have discussed this matter and obtained approval from the planning authority to reduce the wall height to 2.5m. A letter from Cork County Council on the matter formed part of the application. I recommend that this change be allowed (see Condition 3.4 of the recommended PD).
6. **Remove requirement for continuous monitoring of TOC on surface water emissions from the facility (Condition 9.1 and Schedule E of WL 136-1).** The applicant states that surface water run-off will only be intermittent depending on rainfall conditions. Also they claim that the cost of the continuous TOC meter and supporting infrastructure is excessive considering that continuous monitoring, as required in WL136-1, will not be possible.

I recommend that as proposed by the applicant, twice weekly sampling of surface water discharge and analysis for TOC is undertaken for three months. The frequency of monitoring may be reduced to quarterly with the prior agreement of the Agency (see Note 5 of Table D.5.1 of the recommended PD).

(3) Facility Development Status

The provision and maintenance of infrastructure at the facility is to be controlled by Condition 3 of the recommended PD. Infrastructure at the facility includes a newly constructed transfer building, offices, two weighbridges, wheelwash, skip storage and truck parking area, waste water collection and storage infrastructure, surface water collection and management infrastructure. The entire site will be concreted with the exception of some small grassed and landscaped areas.

Monitoring locations and frequencies specified in the recommended PD in general reflect the current monitoring regime under the existing waste licence. However, some amendments have been made to the monitoring requirements having regard to any subsequent agreements made during the enforcement of the existing licence and any amendments requested by the applicant.

(4) Licence History

As previously mentioned, the licence was granted in July 2001. However construction of the facility did not commence until late 2002 and waste acceptance commenced in July 2003. There were 2 complaints made to the Agency in relation to the facility in early 2003. These complaints related to the removal of a hedgerow during construction works that was required to be retained under Condition 4.21.1 of the existing licence. The licensee in subsequent correspondence stated that the hedgerow would be reinstated at the end of 2003.

Since the grant of the waste licence (26/07/01), 2 notifications of non-compliance have been issued. The first one was issued in relation to the removal of a hedgerow as outlined previously. The second notice (issued 29/10/03) related to issues such as the wording of the site-notice board, lack of written records of incoming waste inspections, lack of records of weekly drainage inspections and non-labelling of a monitoring point.

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

The Waste Management Plan for County Cork (dated May 1999) makes reference to the provision of '*a network of solid waste transfer stations in Co. Cork which will allow for the efficient and economic transport of waste*'. The transfer station is in line with such provisions. Also the proposed composting at the facility is in line with the objective of the WMP to treat the organic fraction of waste and ensure that the amount of biodegradable waste going to landfill is reduced.

There is no relevant Water Quality Management Plan and no relevant air quality plan for the immediate environs of the facility.

(6) Submissions

None received.

(7) Recommendation

I recommend that a revised waste licence be granted in accordance with the conditions in the recommended Proposed Decision. In coming to this recommendation, I consider that the continued acceptance of waste at the facility and the associated activities and works would, subject to the conditions of the recommended Proposed Decision, comply with the requirements of Section 40(4) of the Waste Management Act 1996.

Signed: _____

Dated: _____

Ms. Regina Campbell, Inspector
Environmental Management and Planning

19 November 2003

Appendix 1

Site location map Drawing No. 3.1 and site layout Drawing No. 0304802-01 Rev. A.