

<b>MEMO</b>			
<b>TO:</b>	Board of Directors	<b>FROM:</b>	Malcolm Doak
<b>CC:</b>		<b>DATE:</b>	11 <sup>th</sup> July 2002
<b>SUBJECT :</b> Technical Committee Report on Objection to Proposed Decision – Reg. No. 140-1.			

Application Details	
Applicant:	Nurendale Ltd t/a Panda Waste Servives.
Location of Activity:	Rathdrinagh, Beauparc, Co. Meath
Proposed Decision issued:	4/03/02
Objection received:	3/04/02
Circulation of objections:	10/5/02
Inspector:	Mr. Brendan Foley

**Objections received:**

Objection by Applicant                      1. Nurendale Ltd t/a Panda Waste Servives.

**Consideration of the objections.**

The Technical Committee (TC) (Malcolm Doak, Chairperson, David Shannon and Pernille Hermansen, committee members) has considered all of the issues raised and this report details the Committee’s recommendations following the examination of the objections.

**Objection No 1: Nurendale Ltd t/a Panda Waste Services prepared by White Young Green Ireland (3/04/02)**

*Ground 1*

**Condition 1.4: Only those waste categories and quantities listed in Schedule A: Waste Acceptance, of this licence shall be accepted at the facility.**

*The Applicant wishes to increase the tonnages as outlined in Schedule A of the Proposed Decision to the following:*

***A.1 Waste Acceptance***

***Table A.1 Waste Categories and Quantities***

	MAXIMUM WASTE QUANTITY TO BE ACCEPTED (TONNES)
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WASTE TYPE	Year 1 <sup>Note 1</sup>	Year 2	Year 3	Year 4	Year 5 onward
<b>Household waste (PD)</b>	3,000	3,300	3,630	3,993	4,392
<i>Revised</i>	<i>1,000</i>	<i>3,000</i>	<i>3,330</i>	<i>3,630</i>	<i>3,993</i>
<b>Commercial &amp; Industrial (PD)</b>	5,000	5,500	6,050	6,655	7,320
<i>Revised</i>	<i>15,000</i>	<i>20,500</i>	<i>22,550</i>	<i>24,805</i>	<i>27,285</i>
<b>Construction &amp; Demolition (PD)</b>	22,500	24,750	27,225	29,947	32,941
<i>Revised</i>	<i>24,000</i>	<i>26,500</i>	<i>29,000</i>	<i>32,000</i>	<i>35,000</i>
<b>TOTAL (PD)</b>	<b>30,500</b>	<b>33,550</b>	<b>36,905</b>	<b>40,595</b>	<b>44,653</b>
<i>Revised</i>	<i>40,000</i>	<i>50,000</i>	<i>55,880</i>	<i>60,435</i>	<i>66,278</i>

**Note 1:** From the date of commencement of waste activities at this facility.

*The Applicant includes a rationale for the increase in waste quantities and provides two pages on the environmental impacts associated with the increased tonnage written in the language of an EIS. The Applicant considers that the tonnages applied for were insufficient in the light of the waste handling capacity of the proposed facility and business expansion plans. They argue that they assumed that the waste licence would be issued in 2000 and consider that the existing 2002 waste figures equate to Year 3 of Schedule A in the PD. Appendix A to the objection estimates that the actual total tonnage of waste in 2002 will be 38,869 tonnes. The majority of the increase is in relation to 'recyclable waste' particularly with regard to cardboard waste.*

### **Technical Committee's Evaluation**

The applicant originally applied for a waste licence in May 2000 but revised their application on 13 July 2001 due to legal issues regarding company name change and financial provision aspects. As a result the Agency restarted the application process on 14 August 2001 by sending out an Article 14 notice. The company did not provide any new information on proposed increases in waste handling either in the revised EIS of July 2001 or the Article 14(2)(b)(ii) replies received between August 2001 and October 2001. The Proposed Decision was prepared on the basis of the information supplied.

In addition, the applicant's revision to the table above represents an increase of 49% in the annual tonnage applied for in Year 2, and a 270% increase in the handling of commercial and industrial waste. Such an increase would require that an EIA be carried out due to the increase in the quantity proposed. As such the Agency would be *ultra vires* in allowing an increased tonnage beyond the 44,653 tonnes per annum as specified in the PD for Year 5.

The Technical Committee recommend that the total quantity of wastes to be accepted at the facility be confined to 44,653 tonnes per annum as per the Proposed Decision for Year 5.

**Recommendation**

<b>Amend Table A.1 Waste Categories and Quantities to:</b>	
<b>WASTE TYPE</b>	<b>MAXIMUM WASTE QUANTITY TO BE ACCEPTED (TONNES) PER ANNUM</b>
Household waste	4,392
Commercial & Industrial	7,320
Construction & Demolition	32,941
<b>TOTAL</b>	<b>44,653</b>

**Ground 2**

**Condition 3.5.2: The facility entrance area, access roads, parking areas, vehicle fuelling area, all areas where vehicle movement takes place and all waste handling and storage areas shall be impermeable hardstand. The floor of the buildings and all hardstanding areas at the facility shall be concreted and constructed to British Standard 8110 or other standard agreed in advance with the Agency.**

*The Applicant proposes to hardstand the internal waste handling areas and truck wash area in concrete and to finish the remaining areas with impermeable asphalt including car parking areas. Asphalt is a preferable finish as it is less likely to contribute to dust, and it is more aesthetically pleasing than concrete.*

**Technical Committee's Evaluation**

The reason for a concrete cover is to provide for the protection of surface water and groundwater. The Technical Committee is of the opinion that the placement of asphalt in areas of non-core waste activity is satisfactory as long as the asphalt is completed to a proper standard such as **BS 594-2:1992** 'Hot rolled asphalt for roads and other paved areas. Specification for the transport, laying and compaction of rolled asphalt'. Therefore, the TC recommends that the PD be amended as follows:

**Recommendation:**

<b>Amend Condition 3.5.2 as follows:</b> 3.5.2 The facility entrance area, access roads, parking areas, vehicle fuelling area, all areas where vehicle movement takes place and all waste handling and storage areas shall be impermeable hardstand. The floor of the buildings, <b>vehicle wash area, and</b>
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vehicle fuelling area shall be concreted and constructed to British Standard 8110 or other equivalent standard agreed in advance with the Agency. All other surfaces shall be asphalted and constructed to British Standard 594-2:1992 or other equivalent standard agreed in advance with the Agency.

### *Ground 3*

**Condition 3.8.1:** Prior to the commencement of waste activities at this facility the licensee shall provide and maintain a weighbridge and vehicle truckwash at the facility. The truck wash shall not be used for any other purpose other than for the washing of trucks and vehicles associated with this facility.

*The Applicant proposes that the truck wash area can also be used for the intermittent rinsing of skips and containers as a matter of housekeeping. All washings will be collected for transfer to an appropriate wastewater treatment plant.*

### *Technical Committee's Evaluation*

The reason for limiting the truckwash to a vehicle wash system is that it is to be a recycling system. The washing of skips and containers may upset the balancing system within the vehicle wash machinery. Water that cannot be recycled is collected in an underground sump before disposal via tankering to Navan WWTP. The Technical Committee is of the opinion that the vehicle wash should be used for its designed purpose but welcomes the intention to keep skips and containers clean. Further proposals would need to be considered to avoid system failure or tank overload in the context of an issued licence and Agency agreement.

### *Recommendation*

Amend Condition 3.8.1 as per the following :

Prior to the commencement of waste activities at this facility the licensee shall provide and maintain a weighbridge and vehicle truckwash at the facility. The truck wash shall be used for the washing of trucks and vehicles associated with this facility. **Skips and containers may only be washed at the truckwash with the prior agreement of the Agency.**

### *Ground 4*

**Condition 3.9.2:** All access/exit points for delivery and removal of waste at the waste transfer building shall be fitted with suitable noise mitigation measures

*The Applicant proposes that the noise mitigation measures are not necessary at entry/exit points. The entrances of the building have been located on the south side in order to minimise noise breakout in the direction of any noise sensitive receptors. The two main*

*entrances will be fitted with roller shutter doors which will be kept closed where practicable.*

### ***Technical Committee's Evaluation***

The PD requires that there be no clearly audible tonal or impulsive component in the noise emissions from the facility at noise sensitive locations and the PD will also oblige the applicant to comply with the noise emission limit values (ELVs) specified in Schedule C.1. If the noise limits at the noise sensitive locations can be achieved then the TC is of the opinion that the need for noise mitigation measures at access/exit points will not be necessary:

### ***Recommendation***

Delete Condition 3.9.2 from the licence and amend the numbering of Condition 3.9.3 and 3.9.4 to take account of this deletion
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### ***Ground 5***

**Condition 3.16.3.1: Prior to commence (*sic*) of waste activities at this facility, the licensee shall provide, install and maintain three groundwater monitoring wells as specified in Figure J entitled 'Proposed Environmental Monitoring Locations' which was received by the Agency on 13/09/01 of the waste licence application. All redundant groundwater boreholes shall be decommissioned.**

*The Applicant proposes that the installation of new groundwater monitoring wells and groundwater monitoring are not appropriate on a site which is underlain by a poor aquifer (Namurian Shales & Sandstones) and clay soils. Furthermore all waste will be sorted and stored in a contained building over a concrete floor, domestic foul water is to be treated in a 'Biocycle' onsite treatment unit and process foul water shall be collected and treated offsite. Groundwater monitoring is not a requirement at the majority of similar facilities in Ireland.*

### ***Technical Committee's Evaluation***

The application site has currently no permanent monitoring well infrastructure. However, a preliminary ground investigation was carried out by applicant's consultants (KT Cullen & Co) in July 2001 to assess potential hydrocarbon contamination in shallow soils and corresponding groundwater on the former petrol service station which lies in the north-east corner of the proposed waste facility. Six shallow 'window samples' were temporarily installed to a maximum depth of 4m to obtain seven soil samples and three perched groundwater samples. Results for soils show diesel contamination is localised to two locations. There was no detection of any hydrocarbon parameters for groundwater.

The geology and hydrogeology of the area consists of a poor aquifer with relatively thick clay cover (up to 10m deep). The EIS records no groundwater abstraction wells in the area. Given the planned surfacing at the facility as stated above, and the limited groundwater resource potential, the Technical Committee considers that the installation of

groundwater monitoring wells and an associated programme of groundwater monitoring is not necessary.

### ***Recommendation***

Delete Conditions 3.16.3, 3.16.3.1, from the licence. Delete “groundwater” from Condition 8.2. Delete “Groundwater monitoring wells installation and decommissioning” from Schedule B: Specified Engineering Works. Delete ‘Groundwater’ column from Tables D.1.1 and D.5.1, Schedule D. Delete “and Groundwater” from the title of Schedule D.5. Delete “and Groundwater” from the title of Table D.5.1. Delete line entry for ‘Monitoring of Groundwater Quality’, Schedule E.

### ***Ground 6***

**Condition 5.1.2: Waste arriving at the facility shall be inspected at the point of entry to the facility and subject to this inspection, weighed, documented and directed to the waste transfer building. Each load of waste arriving at the waste transfer building shall be inspected upon tipping within this building. Only after such inspections shall the waste be processed for disposal or recovery.**

*The Applicant proposes that waste does not have to be inspected at the point of entry to the facility.*

### ***Technical Committee’s Evaluation***

The TC notes that all waste will be inspected at the collection point by the driver and that all waste is required to be inspected upon tipping within the waste transfer building. The doubling up of inspections at the gate house (point of entry) is not practicable or necessary.

### ***Recommendation***

Amend Condition 5.1.2 as per the following to delete the phrase ‘*inspected at the point of entry to the facility and subject to this inspection*’

Waste arriving at the facility shall be ~~inspected at the point of entry to the facility and subject to this inspection~~, weighed, documented and directed to the waste transfer building. Each load of waste arriving at the waste transfer building shall be inspected upon tipping within this building. Only after such inspections shall the waste be processed for disposal or recovery.

### ***Ground 7***

**Condition 5.2.2: All access/exit points to the waste transfer building shall remain closed (with mitigation measures for noise control in place) when the trommel or timber shredder are in operation. The trommel and timber shredder shall not be operated simultaneously.**

*The Applicant proposes that access/exit points do not need to remain closed during the operation of the trommel or timber shredder. Noise measurements at the nearest sensitive location and theoretical noise calculations of the operation of the trommel and shredder indoors indicate that the resulting noise from their individual operation will not result in noise nuisance at the nearest sensitive receptor. The applicant proposes that the trommel and shredder will not operate together to reduce noise emissions from the building.*

### ***Technical Committee's Evaluation***

Refer to Ground 4 above. The Technical Committee notes the figures supplied. Compliance with the conditions, detailed in Ground 4, relating to noise emissions from the facility will be a legal requirement if included in a waste licence and if compliance can be achieved without requiring the closure of access/exit points then the TC considers that the access/exit points do not need to be closed.

### ***Recommendation***

Amend Condition 5.2.2 as per the following to delete the phrase '*All access/exit points to the waste transfer building shall remain closed (with mitigation measures for noise control in place) when the trommel or timber shredder are in operation*'.

~~All access/exit points to the waste transfer building shall remain closed (with mitigation measures for noise control in place) when the trommel or timber shredder are in operation. The trommel and timber shredder shall not be operated simultaneously.~~

### ***Ground 8***

**Condition 6.5.3: Monitoring and analyses of foul water tankered to the wastewater treatment plant shall be carried out as specified in *Schedule D.4: Monitoring, of this licence.***

*The Applicant proposes that foul water monitoring be undertaken either once every quarter or one load in four, whichever is the least frequent, since the requirements for other waste licences are for quarterly monitoring.*

### ***Technical Committee's Evaluation***

Table D.4.1 of Schedule D4 in the PD specifies that all parameters are analysed one load in four apart from volume which should be measured for every load. The combination of a vehicle wash recycling system and a *biocycle* treatment plant for domestic foul water should reduce the pressures on the underground bunded storage tank which holds process foul water prior to tankering to the Navan Municipal WWTP. It is envisaged that tankering to the WWTP will be minimal which is to be welcomed. Therefore the one load in four testing regime is not a substantial task.

### ***Recommendation***

**No Change**

***Ground 9***

**Condition 7.2: No waste shall be stored external to the waste transfer building unless otherwise agreed in advance with the Agency.**

*The Applicant proposes that in certain circumstances some material may be stored outside undercover, namely cardboard bales awaiting transfer to market in curtain-sided trailers or under tarpulins. Other materials from time to time may be stored outside in covered containers or skips particularly if material arrives at the facility late in the evening.*

***Technical Committee's Evaluation***

The storage of finished cardboard bales outside in the manner stated above is acceptable to the Technical Committee. However any other waste must be stored inside the main transfer building to minimise potential nuisances. The acceptance of waste or material into the transfer station must be during the waste acceptance hours and hours of operation specified in Condition 1.6 of the licence, between the hours of 8.00 a.m. to 6.00 p.m. Monday to Friday inclusive and 9:00 am to 2.00pm on Saturdays. If waste arrives late and is stored outside, as proposed by the applicant, it will not have been fully inspected, as set out in Condition 5.1.2, and may possibly contain unacceptable wastes or wastes with a high nuisance potential.

***Recommendation***

Amend Condition 7.2 as per the following to insert the phrase '*other than baled cardboard*'.

No waste **other than baled cardboard** shall be stored external to the waste transfer building unless otherwise agreed in advance with the Agency. Baled cardboard may only be stored in clearly designated areas and in suitably covered containers.

Signed:

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Malcolm Doak  
Technical Committee Chairperson