

MEMO

TO: Board of Directors **FROM:** Tadhg O'Mahony

CC: **DATE:** 19/10/01

SUBJECT : Macroom Civic Amenity Site (Reg. No. 142-1)

Application details

Application Details	
Applicant:	Cork County Council
Location of Activity:	Codrum, Macroom, Co. Cork
Reg. No.:	142-1
Licensed Activities under Waste Management Act 1996:	Third Schedule: Class 13 Fourth Schedule: Classes 2, 3, 4, 13
Proposed Decision issued on:	07/06/01
Objections received:	03/07/01
Submissions on objections received:	No
Inspector that drafted PD:	Maeve McHugh

Objections received

Objection by Applicant	1
Objection by third party/parties	0
Submission in relation to Objection	0

1. Applicant : Cork County Council

A Technical Committee was established to consider the objections.

The Technical Committee included;

Tadhg O’Mahony, Chairperson

Regina Campbell, Inspector

Sinead McMahon, Inspector

This is the Technical Committee’s report on the objection.

Ground 1 Condition 1.4

The applicant requests that Condition 1.4 of the PD be amended to include “*commercial users using vans*” and “*recyclable waste collected by local authorities*”. The applicant feels that this condition would allow for the efficient recovery and disposal of small quantities of waste which arise.

Technical Committee Evaluation

The TC considers that including “commercial users using vans” is a reasonable request. To maximise recycling at the facility, the TC considers that recyclable waste collected by the local authority should be permitted at the facility.

Recommendation

Amend Condition 1.4 as follows:

Only municipal waste and domestic quantities of household hazardous waste delivered to the Civic Waste Facility by members of the public (**including commercial users using vans**) and **recyclable waste collected by or on behalf of local authorities** shall be accepted at this facility.

Amend Schedule A as follows;

Municipal waste delivered to the civic waste facility by members of the public and **commercial users using vans**, including recyclable materials, domestic quantities of construction and demolition waste and residual household waste.

Recyclable waste collected by or on behalf of local authorities.

Ground 2 Condition 1.5 (2)

The applicant requests that Condition 1.5 (2) of the PD be amended to provide the following operating hours “*between the hours of 8.00 and 18.30 Monday to Friday inclusive with the option to open on Bank Holidays and with the option to open between 8.00 and 13.00 on Sundays*”. The applicant feels that this condition would allow for opening of the facility as required by demand.

Technical Committee Evaluation

The hours of operation provided for in Condition 1.5 (2) of the PD (*between the hours of 8.00 and 18.30 Monday to Saturday inclusive and on Bank Holidays, and between 8.00 and 13.00 on Sundays*) include the hours requested in the objection. The applicant is concerned that the PD requires the facility to be open at all times specified in Condition 1.5. The TC considers that Condition 1.5 (2) does not oblige the applicant to open on all days and times specified but it does restrict operation to the days and hours specified.

Recommendation

No change

Ground 3 Condition 2.1.2

The applicant requests that Condition 2.1.2 of the PD be amended so as to specify that only the facility manager undertake the FAS training programme and that the deputy manager be trained in accordance with a programme to be agreed with the Agency. The applicant feels that amending this condition would allow for adequate in-house training in licence requirements, site procedures, attendance at Module 5 of the FAS training programme and site assessment at a minimum.

Technical Committee Evaluation

The technical committee considers that participation in the FAS waste management course for the facility manager and deputy manager of any licensed site is necessary and is a standard requirement in all waste licences.

Recommendation

No change

Ground 4 Condition 2.2.1

The applicant has requested that condition 2.2.1, regarding submission of the management structure of the facility, be amended from “within *three months of the date of grant of this licence*” to read “*Within three months from the date of acceptance of waste at the facility...*”. The applicant feels that this condition would allow for the fact that the facility may not be completed in terms of construction within three months.

Technical Committee Evaluation

The TC agrees that the Condition should be amended but consider it is reasonable to request submission of the relevant information prior to the acceptance of waste at the facility.

Recommendation

Amend Condition 2.2.1 as follows:

Prior to the acceptance of waste at the facility, the licensee shall submit written details of the management structure of the facility to the Agency. Any proposed changes in the management structure shall be notified in advance in writing to the Agency. Written details of the management structure shall include the following information

- a) the names of all persons who are to provide the management and supervision of the waste activities authorised by the licence, in particular the name of the facility manager and any nominated deputies;
- b) details of the responsibilities for each individual named under a) above; and

c) details of the relevant education, training and experience held by each of the persons nominated under a) above.

Ground 5 Condition 2.5.1

The applicant requests that Condition 2.5.1 of the PD regarding establishment of a communications programme, be amended to “*This shall be established within six months of commencing waste acceptance*”. The applicant feels that this condition would allow for the fact that the facility may not be completed in terms of construction within three months.

Technical Committee Evaluation

The TC agrees that the Condition should be amended but consider it is reasonable to request the establishment of the communications programme prior to the acceptance of waste at the facility.

Recommendation

Amend Condition 2.5.1 as follows:

The licensee shall establish and maintain a Communications Programme to ensure that members of the public can obtain information at the facility, at all reasonable times, concerning the environmental performance of the facility. This shall be established **prior to the commencement of waste acceptance at the facility.**

Ground 6 Conditions 3.10.1 and 3.10.2

The applicant requests that Condition 3.10.1 and 3.10.2 of the PD be amended to allow on-site treatment of foul sewage arising on site.

The applicant feels that amending this Condition would allow for a small load which would otherwise be pumped over a long distance to the sewer of the Sanitary Authority.

Technical Committee Evaluation

The TC considers that a change to Condition 3.10.1 and 3.10.2 is not necessary as the condition contains sufficient scope for the applicant to agree an alternative treatment method with the Agency.

Recommendation

No Change

Ground 7 Condition 3.11.5

The applicant requests that Condition 3.11.5 of the PD regarding bund testing be amended from, “within 9 months of the date of grant of the licence” to “*within 9 months of commencing waste acceptance.*” The applicant feels that this condition would allow for the fact that the facility may not be completed in terms of construction within three months.

Technical Committee Evaluation

The TC agrees that the Condition should be amended but consider it is reasonable to request submission of the report prior to the acceptance of waste at the facility.

Recommendation

Amend Condition 3.11.5 as follows:

The integrity and water tightness of all the bunds and their resistance to penetration by water or other materials stored therein shall be confirmed by the licensee and shall be reported to the Agency, **prior to the acceptance of waste at the facility**. This confirmation shall be repeated at least once every three years thereafter and reported to the Agency on each occasion.

Ground 8 Condition 5.2.1

The applicant requests that Condition 5.2.1 of the PD be amended to include “*small commercial vans*” and “*recyclable waste collected by local authorities*”. The applicant also requests that the facility is not to be used by large local authority refuse collection vehicles. The applicant feels that this condition would allow for the efficient recovery and disposal of small quantities of waste which arise.

Technical Committee Evaluation

The TC considers that including “small commercial vans” is a reasonable request. To maximise recycling at the facility, the TC considers that recyclable waste collected by or on behalf of the local authority should be permitted at the facility. Schedule A of the PD specifies waste types that can be accepted at the site. Waste from local authorities (with the exception of recyclable waste) is not permitted to be accepted, hence condition 5.2.1 does not need to be amended in this regard.

Recommendation

Amend Condition 5.2.1 as follows:

The Civic Waste Facility shall only be used by private vehicles, **small commercial vans and vehicles collecting recyclable waste by or on behalf of the local authority**. The facility shall not be used as a transfer station for disposal of waste by commercial waste disposal contractors.

Ground 9 Condition 5.2.5

The applicant requests that Condition 5.2.5 of the PD be amended so that the clearing of waste from compactors at the end of each working day is not required. The applicant feels that amending this Condition would allow for more cost-effective management of the site. The applicant also refers to conditions 5.4.9 and 5.4.10. in objecting to Condition 5.2.5

Technical Committee Evaluation

The TC considers that this is a reasonable request. The condition will still require waste to be cleared from the floor of the facility and the hoppers.

Recommendation

Amend Condition 5.2.5 as follows:

At the end of the working day the floor of the Civic Waste Facility and the hoppers shall be cleared of waste.

Ground 10 Condition 5.3.1

The applicant requests that Condition 5.3.1 of the PD be amended from “*Landscaping of the facility.....shall be carried out within 18 months of the date of grant of the licence*” to “*18 months of the date of commencing waste acceptance at the facility*”. The applicant feels that this condition would allow for the fact that the facility may not be completed in terms of construction within the specified time period in the proposed decision.

Technical Committee Evaluation

The TC agrees that the Condition should be amended but consider that 12 months following completion of construction works at the facility would be a more reasonable timeframe.

Recommendation

Amend Condition 5.3.1 as follows:
Landscaping of the facility as described in *Attachment H.7* of the application and as shown in *Drawing No. 9013007/01/5* **shall be carried out within twelve months following completion of construction of the facility.**

Ground 11 Condition 6.4

The applicant requests that Condition 6.4 (6.4.1 - 6.4.9) of the PD be deleted if the on-site treatment system for wastewater from offices is acceptable.

Technical Committee Evaluation

The TC considers that the condition should remain as it is only applicable “*in the event of emissions to sewer*”.

Recommendation

No change

Ground 12 Condition 9.2.2

The applicant requests that the time-scale in Condition 9.2.2 of the PD regarding submission of an ERP be amended from “*within six months of the date of grant of the licence*” to “*six months of the date of commencement of waste acceptance at the facility*”. The applicant feels that this condition would allow for the fact that the facility may not be completed in terms of construction within the stated period.

Technical Committee Evaluation

The TC agrees that the Condition should be amended but consider it reasonable to request submission of the ERP prior to the acceptance of waste at the facility.

Recommendation

Amend Condition 9.2.2 as follows:

Prior to the commencement of waste acceptance at the facility, the licensee shall submit a written Emergency Response Procedure (ERP) to the Agency for its agreement. The ERP shall address any emergency situations which may originate on the facility and shall include provision for minimising the effects of any emergency on the environment. This shall include a risk assessment to determine the requirements at the facility for fire fighting and fire water retention facilities. The Fire Authority shall be consulted by the licensee during this assessment.

Ground 13 Condition 11.1(a)

The applicant requests that Condition 11.1(a) of the PD be amended to allow submission of reports/notifications to the EPA headquarters or the divisional office at Inniscarra, Cork. The applicant feels it would allow for more flexible reporting arrangements.

Technical Committee Evaluation

The TC considers that this request is already accommodated in the wording of Condition 11.1.

Recommendation

No change

Ground 14 Condition 11.4.1

The applicant requests that the time-scale, in Condition 11.4.1 of the PD regarding submission of a drawing showing monitoring locations, be amended from “within six months of the date of grant of this licence” to “within six months of commencing waste acceptance at the facility”. The applicant feels that this condition would allow for the fact that the facility may not be completed in terms of construction within the stated period.

Technical Committee Evaluation

The TC agrees that the Condition should be amended but consider it reasonable to request submission of the relevant information prior to the acceptance of waste at the facility.

Recommendation

Amend Condition 11.4.1 as follows:

Prior to the commencement of waste acceptance at the facility, the licensee shall submit to the Agency an appropriately scaled drawing(s) showing all the monitoring locations that are stipulated in this licence. The drawing(s) shall include the reference code of each monitoring point.

Ground 15 Condition 11.5.1

The applicant requests that the time-scale in Condition 11.5.1 of the PD be amended from “within thirteen months of the date of grant of this licence” to “thirteen months of commencing waste acceptance at the facility”. The applicant states that this

condition would allow for the fact that construction of the facility may not be completed within the specified timescale.

Technical Committee Evaluation

The TC considers that this is a reasonable request.

Recommendation

Amend Condition 11.5.1 as follows:

The licensee shall submit to the Agency for its agreement, **within thirteen months from the date of commencing waste acceptance at the facility**, and within one month of the end of each year thereafter, an Annual Environmental Report (AER).

Ground 16 Condition 12.1

The applicant requests that Condition 12.1, Agency Charges, be re-written to take account of the time for developing the site.

Technical Committee Evaluation

The TC has noted the concerns of the applicant but considers that a significant amount of Agency input will be required prior to the acceptance of waste at the facility. Condition 12.1 provides for the adjustment of the annual charges.

Recommendation

No change

Ground 17 Schedule A

The applicant requests that Schedule A of the PD be amended to include a provision to allow waste quantities to be reviewed in the event of demand exceeding capacity as per landfill licences.

Technical Committee Evaluation

The Waste Framework Directive and the Waste Management Acts require that the quantity of waste to be accepted at a facility be specified in the waste licence. The PD provides for the quantities of waste applied for in the application. The applicant can apply for a review of their licence at their own discretion. The TC considers that no change should be made to Schedule A.

Recommendation

No change

Ground 18 Schedule B

The applicant requests “*Discharge to sewer*” be deleted from Schedule B of the PD.

Technical Committee Evaluation

The TC considers that the condition should remain as it is only applicable in the event of emissions to sewer under in accordance with condition 6.4.

Recommendation

No Change

Ground 19 Schedule C

The applicant requests that emission limits for noise emanating from the facility be amended. Existing background noise levels exceed emission limits. The applicant feels that the PD should be amended to reflect the existing situation.

Technical Committee Evaluation

The emission limits set should remain unchanged. These limits should, however, relate to noise emissions associated with waste activities undertaken at the facility as measured at the facility boundary and the nearest noise sensitive locations.

Recommendation

Amend Schedule C.1 Noise emissions
C.1 Noise emissions: (from associated waste activities undertaken at the facility and measured at the monitoring points indicated in Table D.1.1 and the nearest noise sensitive locations to the facility boundary)

Amend Table D.1.1 Monitoring Locations
Delete Reference to N4 and N5
Include NSL

NOISE STATIONS
N1
N2
N3
NSL ^{Note1}

Note 1: Any noise sensitive location