

# INSPECTORS REPORT

**WASTE LICENCE REGISTER NUMBER: 169-1**

**APPLICANT:** Mulleady's Ltd.

**FACILITY:** Mulleady's Ltd., Cloonagh, Drumlish, Co. Longford

**INSPECTOR:** Kealan Reynolds

**INSPECTOR'S RECOMMENDATION:** That a waste licence be granted subject to a number of conditions.

## **(1) Introduction**

Mulleady's Ltd. have applied for a waste licence to continue to operate an existing non-hazardous waste transfer station at Cloonagh, Drumlish, Co. Longford. The facility (~ 3.5 ha) is situated just off the R198 approximately 8 miles north of Longford Town and approximately 2 miles south of Drumlish. The facility which has been operating since 1995 is unauthorized and no waste licence or permit has been issued for its operation. The facility is located to the rear of a pre-cast concrete plant, a builders/agricultural stores and engineering/fabrication works and it is fully serviced with the majority of the infrastructure required by the recommended Proposed Decision (PD) already in place.

To gain access to the waste facility one must currently pass through the concrete and engineering works prior to entering the waste facility. The waste facility is not clearly designated from the rest of the site owned by Mulleady's Ltd.. There are approximately 24 private dwellings located within 500m of the facility boundary and all of these dwellings are standalone rural residences. **A plan showing the location and proposed layout of the facility to which the application relates is provided in Appendix 1.**

The applicant operates a household, commercial and industrial waste collection and skip service in the Longford area and the applicant also provides a collection/baling point for farm plastics. The applicant is by far the largest waste collector in Longford and collects household waste on behalf of Longford Town and County Councils. Two waste transfer buildings have been constructed at the facility, one is used for the processing and bulking of mixed wastes whilst the second building is used primarily for the sorting and baling of recyclable materials such as cardboard, paper and plastics. Planning permission has been granted for the main waste transfer building and on 23<sup>rd</sup> April 2003 Longford County Council issued three planning decisions which permit the retention of the existing buildings at the facility and also permits the provision of a new site office, vehicle wash, civic waste facility, etc.. Subject to appeals to An Bord Pleanala, all existing and proposed developments at the facility have planning permission other than the proposed composting unit which will be the subject of an additional planning application. The applicant currently accepts approximately 16,000 tonnes of waste per annum, of which approximately 85% is made up of municipal and industrial waste. The remaining 15% is made up of construction and demolition waste, farm plastics and road sweepings. The applicant proposal to increase waste acceptance at the facility from 16,000 tonnes per annum to 95,000 tonnes per annum is based on a 20% increase in business on an annual basis up to 2006 plus additional factors such as the potential expansion of Mulleady's waste collection service into surrounding counties, possible increase in population in the Longford area and an increase in the quantity of development in the area (i.e. increase in C&D waste).

During the process of the application, the Agency has carried out a number of inspections of the facility and it noted on a number of occasions that the applicant has not been operating the facility in a satisfactory manner. Some of the issues noted by

the Agency include; stockpiling of significant quantities of contaminated scrap metal and waste timber, ponding of contaminated run-off at the facility, storage of organic wastes outdoors and the removal of waste to Northern Ireland for disposal without the required documentation being in place. All of the above issues were brought to the attention of Longford County Council.

The applicant has applied for Classes 11, 12 and 13 of the Third Schedule and Classes 2, 3, 4 and 13 of the Fourth Schedule of the Waste Management Act 1996. Class 13 of the Third Schedule is the principal activity at the facility.

<b>Quantity of waste (tpa) to be accepted</b>	95,000
<b>Environmental Impact Statement Required</b>	Yes, I have assessed the EIS and consider it to be in compliance with the EIA Regulations
<b>Number of Submissions Received</b>	2

#### **SITE VISITS:**

<b>DATE</b>	<b>PURPOSE</b>	<b>PERSONNEL</b>	<b>OBSERVATIONS</b>
18/01/02	Site Notice Inspection	Kealan Reynolds	Site Notice Compliant
12/02/02	Site Inspection	Kealan Reynolds	Facility untidy
20/11/02	Site Inspection	Kealan Reynolds	Condition of facility improved
21/01/03	Site Inspection	Kealan Reynolds	Trial for the treatment of organic wastes ongoing.

#### **(2) Facility Development**

Two waste transfer buildings, surface and foul water drainage systems and waste storage bays are in place at the facility. The recommended PD requires the applicant to provide additional infrastructure such as a weighbridge, odour/dust control measures, facility office and an on-site sewage treatment system. All wastewater generated at the facility is to be collected in a storage tank at the facility and subsequently tankered off-site for treatment at the Wastewater Treatment Plant for Longford Town. All surface water collected shall pass through a silt trap and oil interceptor prior to discharge to a nearby drainage ditch and all sewage generated at the facility shall be treated on-site by means of a proprietary wastewater treatment unit. The licensee proposed the installation of a BMS Blivet™ treatment system at the facility.

The facility is currently accessed via the concrete and engineering works that are located immediately adjacent to the waste facility. The recommended PD requires that there is no vehicular access from the concrete/engineering works and that a dedicated entrance to the facility from the main road is provided as proposed by the applicant.

The applicant had proposed to use soil as medium for the treatment of organic wastes at the facility and trials on this system were carried out without the notification of the Agency or under the conditions of a waste licence or permit. The applicant placed a 300mm layer of soil on a concrete slab and mixed in organic waste with the soil and claimed that the soil would breakdown the waste. Samples taken of the run-off from the “treated” waste material showed that the organic waste had not been suitably stabilised by its treatment in the soil (e.g. BOD – 4,440mg/l, Ammonia 70.2mg/l). Condition 4.4.1 of the recommended PD prohibits the use of soil as a medium for the treatment of organic waste. The recommended PD requires the applicant to provide a

fully enclosed and fully aerated composting unit at the facility and a suitably designed and sized biofilter shall be installed to treat all air emissions from the proposed composting plant. The applicant proposed a fully enclosed aerated composting facility in the waste licence application. Such details will have to be agreed with the Agency prior to its installation.

I consider that the acceptance of up to 3,000 tonnes per annum (~60 tonnes per week) could be integrated into the existing waste acceptance/handling areas. The recommended PD requires the applicant to provide a dedicated construction and demolition waste acceptance and processing area if greater than 3,000 tonnes per annum of this waste type is accepted at the facility.

### **(3) Waste Types and Quantities**

Waste types and quantities to be accepted at the facility are provided for in Schedule A of the recommended PD. The recommended PD requires the applicant to implement waste acceptance procedures at the facility. The applicant currently accepts approximately 16,000 tonnes per annum but proposes to increase up to a maximum of 95,000 tonnes per annum, this allowing for an increase in the waste being produced in the Longford area and an increase in the catchment from which the applicant would accept waste.

The majority of the waste accepted at the facility such as municipal, commercial and industrial wastes will be co-mingled and the applicant proposes to shred and trommel all such wastes in one of the two waste buildings. The fines taken off the trommel will be composted and the oversized fractions from the trommel will pass along a picking line where recyclables will be removed where possible. Condition 4.4.3 of the recommended PD limits the amount of waste to be composted at the facility to 10,000 tonnes per annum.

The remaining fraction of the waste will be bulked up and sent off-site for disposal. Pre-segregated recyclables (farm plastics, some commercial and industrial waste) accepted at the facility will be processed in the second of the waste transfer buildings where a conveyor and baler are located.

It is considered that the applicant has sufficient capacity at the facility to handle the proposed waste quantities with the exception of the proposed construction and demolition wastes. As outlined above the licensee shall have to provide a dedicated area for the handling and processing of construction and demolition waste in the event of > 3,000 tonnes per annum of construction and demolition waste being accepted at the facility.

### **(4) Emissions to Air**

**Dust:** The recommended PD requires the applicant to carry out all waste processing indoors and also requires that a localised dust suppression system be installed on waste handling plant. Schedules D and C set out the monitoring requirements and emission limit values for dust monitoring.

**Odour:** An odour impact assessment was completed by the applicant as part of the waste licence application to assess the potential impacts of the proposed composting activities on the local environment. The results of this assessment show that if the odour control measures that have been provided for in the recommended PD (i.e. full enclosure, air extraction, biofiltration, etc.) are implemented then the composting activities should not have a significant impact on the surrounding environment. The odour impact assessment (completed on behalf of the applicant) provided isopleth

figures modelled on the basis of 98 percentile for a concentration of  $\leq 60\text{ou/m}^3$ ,  $\leq 30\text{ou/m}^3$  and  $\leq 1.50\text{ou/m}^3$ . The assessment shows that providing the applicant encloses the composting process and provides a suitable biofilter to treat all air emissions from the facility that up to 10,000 tonnes of waste per annum could be composted at the facility without creating a nuisance in the vicinity of the facility.

In addition to the odour control measures to be implemented and installed at the composting operation, the recommended PD also requires a number of measures to be taken at the main waste transfer building. Condition 6.4.5.1 of the recommended PD requires that the doors of the waste buildings be kept closed where practicable and the area used for the storage of the fines from the trommel should be fully enclosed as per Condition 3.20.

**Noise:** The facility will only be permitted to operate between 6am – 7pm Monday to Friday and between 6am and 4pm on Saturdays and all waste activities shall must be carried out indoors. The recommended PD requires that no tonal or impulsive shall be audible at any of the noise sensitive receptors adjacent to the facility. The noise monitoring requirements are provided for in Schedules D and C of the recommended PD.

#### **(5) Emissions to Groundwater**

The bedrock beneath the facility is not considered to be a important aquifer (either locally or regionally) however there are some groundwater wells in the vicinity of the facility that are used for domestic/agricultural use. During the application process the Agency carried out a number of inspections of the facility and noted that there was a significant quantity of waste being stored on an unpaved area to the rear of the waste buildings. The applicant was requested to undertake groundwater monitoring to assess the impact of the storage of wastes on the groundwater beneath the facility. The groundwater results showed that the quality of groundwater was generally acceptable, however Diesel Range Hydrocarbons were slightly elevated at  $48\mu\text{g/l}$  and analysis of the ponded surface water sitting on an impermeable part of the facility showed elevated levels of Ammonia of ( $47\text{mg/l}$ ) and BOD ( $3120\text{mg/l}$ ). The recommended PD requires that the existing groundwater well be used to monitor groundwater beneath the facility. In addition the applicant will be required analyze groundwater samples from any private groundwater wells within 250m of the facility, where access is permitted. It is considered that this requirement could be removed in the case that repeated monitoring demonstrates that there has been no negative impact on the groundwater from previous activities at the facility. In addition the recommended PD requires that all waste storage and processing shall take place on an impermeable surface.

#### **(6) Emissions to Surface Water**

All surface water collected at the facility will pass through a silt trap and class I oil interceptor prior to discharge. The surface water will be discharged to a small drainage ditch that is located at the northern corner of the facility and this in turn feeds into the River Black which subsequently drains into the Rinn River.

The recommended PD requires that no wastewater is discharged from the facility to surface water. Condition 6.2 of the recommended PD requires that the site roads are maintained in a satisfactory manner so as to prevent the build up of silt and the potential discharge of suspended solids to the nearby watercourses.

Schedule C and D of the recommended PD provide for the emission limit values and surface water monitoring requirements respectively. Condition 5.4.1 also sets trigger levels for discharges to surface water.

### **(7) Disposal of Wastewater and Sewage**

All wastewater generated at the facility shall be collected and drain to a leachate storage tank located below ground level to the rear of the waste buildings. Condition 3.9.3 of the recommended PD requires that high level alarms be fitted to this tank and that at no times shall it be filled to more than 90% of its capacity. When required, wastewater from the leachate storage tank will be transported off-site for treatment at Longford Wastewater Treatment Plant. The Agency issued a notice under Section 52 of the Waste Management Act 1996 to Longford Town Council and the contents of the response received have been included in the recommended PD.

All sewage generated at the facility will be treated on-site prior to discharge to a percolation area and the emissions from the treatment unit shall be monitored as required by Condition 8.1 and Schedule D of the recommended PD. Due to the proximity of the facility to other business' owned and operated by Mulleady's Ltd. the recommended PD requires that only those wastewaters and sewage generated at the facility shall be collected and treated at the facility.

### **(8) Other Significant Environmental Impacts**

None.

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

- The Waste Management Plan for the midlands region was adopted in 2001 and it proposes that a recycling facility be provided in the Longford area. It does not specifically state that Mulleady's transfer station is an integral part of the plan, although this facility handles the majority of the wastes arising in County Longford. In addition the applicant has proposed to provide a Civic Waste Facility that shall contain a number of bring banks and outlets for the recycling of wastes and the provision of such a facility would be in line with the waste collection policy referred to in the plan.
- The Water Quality Management Plan for the Upper Shannon Region (1990) sets objectives and standards for water quality in the region and compliance with the recommended PD should ensure that none of these objectives/standards are breached.

### **(10) Submissions/Complaints**

Two submissions were received in relation to this waste licence application.

1. *One of the submissions was received from Dúchas in which they stated that they had no objection to the proposed development from a nature conservation perspective.*

#### **Comment**

None

2. *The second submission was received from the Cloonaugh Residence Group (05/02/02) in which concerns were expressed in relation to the storage of large volumes of organic waste at the facility that attracts vermin and birds and they in turn carry the organic material from the facility. Concerns were also expressed in relation to odours arising from the facility and the submission requested a meeting with the Agency regarding the proposed activities at the facility.*

**Comment**

The Agency met with representatives of the Cloonaugh Residence Group 12<sup>th</sup> February 2002 and outlined the waste licensing process to them. The recommended PD requires that all waste is handled indoors and that only baled paper, baled plastic, glass and segregated construction and demolition wastes may be stored outside the facility (Condition 5.8). In addition any wastes stored outdoors must not be stored more than 3m in height and this will ensure that the wastes are not visible from the local dwellings. The recommended PD requires the applicant to ensure all composting takes place in an enclosed building and the air emissions from the composting operations subsequently treated. In addition the recommended PD requires the applicant to put in place a communications programme to involve and inform the local community.

Signed \_\_\_\_\_  
Kealan Reynolds, Inspector,  
Environmental Management & Planning.

Dated:

**APPENDIX 1**  
**LOCATION MAP**