

MEMO			
TO:	Board of Directors	FROM:	Michael Henry
CC:		DATE:	16 th July 2003
SUBJECT : Technical Committee Report on Objections to PD – Reg. No.171-1			

Application Details	
Applicant:	Greenstar Recycling Holdings
Location of Activity:	Forge Hill, Kinsale Road, Ballycurreen, Co. Cork
PD issued:	25/03/03
Objections received:	23/04/03
Submission on objections received:	None
Inspector:	Ms. Mary O Hara

Consideration of the objections/submissions on the objections

Objections were received from (a) Mr. Jim O Callaghan, O Callaghan Moran and Associates on behalf of Greenstar Recycling Holdings Ltd. and (b) Mr. Hubert Fitzpatrick, A&L Goodbody Consulting on behalf of MW Consultants and the Business Community in relation to the PD. The Technical Committee (Michael Henry, Chairperson, Kealan Reynolds and John Gibbons committee members) has considered all of the issues raised and this report details the Committee's recommendations following the examination of the objections/submissions on objections.

Objection A : Mr. Jim O Callaghan, O Callaghan Moran and Associates on behalf of Greenstar Recycling Holdings Ltd.

Specific Grounds

Ground No. 1 (Condition 1.5 and Schedule A Waste Acceptance)

A variation in the waste volumes of the different waste types specified in Table A.1 of Schedule A is requested. However, the total volumes will not exceed the current limit specified in the PD. This is required because future market conditions will dictate the actual volumes of different waste types that can be accepted and the objector requests that the maximum annual limits on the individual waste types be removed to allow up to 60% of the total waste to comprise household waste.

Technical Committees Evaluation:

The applicant has requested a variation in the tonnages of each waste type (household and commercial/industrial) specified in the waste licence. However, the technical committee notes that the total tonnage to be accepted at the facility on an annual basis will remain unchanged. The technical committee recommends that Schedule A is amended to provide for an increase in the annual quantities of the individual waste types contingent on the total tonnage remaining the same.

Recommendation:

Amend Schedule A as follows:

Table A.1 Waste Categories and Quantities

WASTE TYPE	MAXIMUM (TONNES PER ANNUM) ^{Note 1}
Household waste collected by or on behalf of the local authority	49900
Commercial Waste	49900
TOTAL	99800

Note 1: The categories and quantities referred to in this table may be amended with the agreement of the Agency provided the total quantity of waste specified is not exceeded.

Ground No. 2 (Condition 1.6.1)

The objector requests clarification that waste collection vehicles can leave the facility before 07.00 in the morning. If the movement of vehicles off-site is deemed to be part of site operations, it is requested that the operational hours be amended to 06.30 in the morning to be consistent with the planning permission issued by Cork Co. Co.

Technical Committees Evaluation:

The technical committee recommends that the hours of operation are amended from 07.00 to 06.30 to provide for the movement of waste vehicles from the facility in the early morning. It is also noted that the applicant must also comply noise emission limit values for day time and night time.

Recommendation:

Amend Condition 1.6.1 as follows:

The facility may be operated between the hours of **06:30** – 20:00 Monday to Saturdays inclusive.

Ground No. 3 (Conditions 1.6.2)

There appears to be a typographical error in Condition 1.6.2 which states that waste shall not be accepted between the hours 08.00 and 19.00 Monday to Saturday. This condition should be amended to delete the word 'not'.

Technical Committees Evaluation:

The technical committee note that the word 'not' was included in Condition 1.6.2 in error.

Recommendation:

Amend Condition 1.6.2 as follows:

Waste shall be accepted at the facility between the hours of 08:00 – 19:00 Monday to Saturdays inclusive.

Ground No. 4 (Condition 2.4.1)

Clarification is requested on the word 'involve' in Condition 2.4.1 (Communications Programme).

Technical Committees Evaluation:

Condition 2.4 requires a communications programme to be initiated with the local community and this typically involves a two-way process, which in addition to informing them of various issues associated with the facility, also takes into consideration any concerns or comments which they may have. The Communications Programme is also required for other waste licensed facilities within the Greenstar Recycling Holdings group and the applicant should have regard to the content of these when preparing the programme for this facility.

Recommendation:

No change

Ground No. 5 (Condition's 3.8.1 & 5.6.3)

The requirement to provide a wheelwash should be removed as every area of the site accessed by waste vehicles will be paved and the vehicles will not travel over waste or be involved in any site activities where waste or other debris could be entrained. The reference to wheelwash should be removed from Condition 5.6.3

Technical Committees Evaluation:

The technical committee notes the applicants comments in relation to the need for a wheelwash at the facility. However, consider the quantity of waste to be accepted at the facility together with its proposed location, the technical committee considers that the requirement for a wheelwash should remain.

Recommendation:

No change

Ground No. 6 (Condition 4.4.2)

The requirement to submit a Decommissioning and Aftercare Plan should be removed as a Decommissioning Plan and proposals for Aftercare Management were included in the application.

Technical Committees Evaluation:

The technical committee considers that the Decommissioning and Aftercare Plan should be revised as necessary to take into account the requirements of the conditions of the waste licence.

Recommendation:

No change.

Ground No. 7 (Condition 5.2.5 (sic))

The objector requests that Condition 5.2.6 (incorrectly referred to as Condition 5.2.5 in objection) be amended to permit the acceptance of waste from once off commercial activities and individual householders. Condition 5.2.6 of the PD appears to restrict the hire of skips on a once off basis to such clients. Greenstar will conduct a telephone interview of prospective once-off customers and the waste acceptance procedures employed at the facility will also ensure that any unsuitable waste will be identified and handled in the manner specified in the licence.

Technical Committees Evaluation:

Condition 5.2.6 of the PD requires that waste should only be accepted at the facility from known customers or new customers which have been subject to initial waste profiling and characterisation off-site. The technical committee considers that difficulties may arise in having to undertake off-site profiling and characterisation for every once-off customer and it recommends that this requirement be removed. However, it notes that the applicant will ascertain the likely nature of the waste by telephone and Condition 5.2.6 should be amended to reflect this. Also, the PD requires detailed waste acceptance procedures to be established prior to the acceptance/handling of waste and these will ensure that only those waste types permitted by the licence are accepted at the proposed facility.

Recommendation:

Amend Condition 5.2.6 as follows:

Waste shall only be accepted at the facility from known customers or new customers for whom the nature, source and type of waste has been established.

Ground No. 8 (Condition 5.2.7)

This Condition as written assumes that Greenstars 'customers' will solely consist of waste collectors. Whilst the majority of waste will be delivered by waste collectors, a portion may be delivered by the waste producers who are the customers and who are not obliged to have waste collection permits. Condition 5.2.7 should be amended to permit access to the facility by waste producers who deliver their own waste to the facility.

Technical Committees Evaluation:

Condition 5.2.7 stipulates that waste shall only be accepted from customers who are holders of waste permits under the Waste Management (Collection Permit) Regulations or from other

licensed/permitted facilities. The technical committee notes that some waste may be accepted at the facility from producers of the waste (rather than waste collectors) and it recommends that the condition is amended to provide for this.

Recommendation:

Amend Condition 5.2.7 as follows:

Waste shall only be accepted at the facility, from customers who are holders of a waste permit **(where required)** under the Waste Management (Collection Permit) Regulations 2001 or from other licensed/ permitted facilities.

Ground No. 9 (Condition 5.5.1)

Condition 5.5.1 should be amended to include the word 'collector'.

Technical Committees Evaluation:

The technical committee considers that Condition 5.5.1 should be amended to include the word 'carrier'.

Recommendation:

Amend Condition 5.5.1 as follows:

Waste sent off-site for recovery or disposal shall only be conveyed by a waste **carrier** agreed in advance by the Agency.....

Ground No.'s 10 & 11 (Condition 6.1 & Table C.4 in Schedule C; Condition 8.1 & Schedule D)

The emission limit values specified in the PD are significantly lower than those sought in the waste licence application (which were based on those set out in waste licences Reg. No.'s 79-1 and 3-2). It is considered unlikely that the wastewater generated at the facility can consistently meet the limits in the PD and it is requested that they be amended to those provided in Attachment H.10 of the application. The requirement to monitor pH and temperature on a continuous basis is not practical and is excessive. Also the frequency of monitoring should be amended from weekly to monthly.

Technical Committees Evaluation:

This objection relates to the emission limit values/monitoring for emissions to sewer which were specified in the PD and which reflected Cork Co. Co.'s Section 52 consent. The Agency wrote to Cork Co. Co. (as the Sanitary Authority) requesting any comments it had on the objection and it stated that the limits and monitoring should be retained (see Appendix 1).

Recommendation:

No change

Ground No. 12 (Condition 7.4.3.1)

This condition should be amended to remove the mandatory provision of dust curtains on entry/exit points to the waste transfer building. The applicant will conduct (within 12 months of start of operations) an assessment of the effectiveness of the dust abatement measures, waste processing and storage and if it is then concluded that dust curtains are required, they will be installed.

Technical Committees Evaluation:

The technical committee considers that dust curtains are necessary to minimise the escape of significant dust emissions from the waste transfer building and these should be provided prior to the acceptance of waste.

Recommendation:

No change

Ground No. 13 (Condition 7.4.3.2)

Based on the proposed operations and the findings of the comprehensive odour impacts assessment (submitted as part of the application), an air extraction system is not required. However, if the report on the effectiveness of the odour abatement measures required by Condition 7.5 finds that air extraction is necessary, then it will be provided.

Technical Committees Evaluation:

Condition 7.4.3.2 requires the provision of a number of elements of an odour management system including the carrying out of waste handling indoors, regular sweeping and washing of floors, doors of the building should be kept closed where possible and odour neutralising agents should be used where necessary. The technical committee note that some elements of this condition are already provided for elsewhere in the PD (i.e. carrying out of waste handling indoors, cleaning/washing of floors, doors of building to be kept closed) and these should be removed from Condition 7.4.3.2 to avoid repetition. The technical committee considers that in order to minimise the risk of odours/dust having a significant impact on the surrounding environment and having regard to the nature, type and quantity of waste to be accepted at the facility, the requirement to install an air extraction system should remain. This will have to be agreed with the Agency as a Specified Engineering Works. By installing the air extraction system, the use of odour neutralising agents should not be required and should therefore be removed from Condition 7.4.3.2.

Recommendation:

**Amend Condition 7.4.3.2 as follows:
Installation of an odour management system which includes an appropriately sized air extraction system.**

Ground No. 14 (Condition 9.4.4)

The objector requests that Condition 9.4.4 is amended to reflect that in the event that off-site monitoring indicates a deterioration in water quality, possibly associated with the facility, the licensee should undertake investigations to establish if activities at the facility are the cause of the problems and if so, implement the necessary remedial measures.

Technical Committees Evaluation:

The technical committee considers that there is no significant risk to groundwater arising from the proposed activities and therefore this condition should be removed.

Recommendation:

Delete Condition 9.4.4

Objection B: Mr. Hubert Fitzpatrick, A&L Goodbody Consulting on behalf of MW Consultants and the Business Community

General Grounds

The applicants and the Agency have failed to address and consider the cumulative effects of two proposed waste transfer facilities which will be located side by side at this location. Both developments (IPODEC and Celtic Waste Limited (Greenstar Recycling Holdings)) have been granted planning permission by Cork Co. Co. Two transfer stations located side by side will result in unnecessary duplication with an over supply of such facilities on the south side of Cork city. The final destination of the waste will be to the north of the city resulting in unnecessary transportation of waste across the city. This policy does not accord with the Waste Management Plan or the statutory provisions of the Waste Management Act 1996.

Technical Committees Evaluation:

The Agency has already deemed that the EIS complies with the EIA regulations with regard to the impacts of the proposed facility on the environment. The issue of two transfer stations located side by side is outside the scope of the waste licence. The technical committee notes that the Cork Waste Management Plan 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'.

Recommendation:

No change

Signed: _____

Michael Henry
Technical Committee Chairperson

**Appendix 1 – Cork Co. Co. comments on objection
(Received 16th June 2003)**