

INSPECTORS REPORT

WASTE LICENCE REGISTER NUMBER 173-1

IPODEC Ireland Limited, Forge Hill Materials Handling and Recycling Facility, Forge Hill, Kinsale Road, Co. Cork (Reg. No. 173-1)

Recommendation: The recommended PD as submitted to the Board be approved

(1) Introduction:

IPODEC Ireland Limited (IPODEC) have applied to operate a new Materials Handling and Recycling Facility in the Forge Hill Area, off the Kinsale Road, Co. Cork. IPODEC have operated waste recycling and waste transfer activities at this location since 1991. They currently hold a waste permit (Ref. No. 02/01) issued by Cork Co. Council.

The site covers an area of approximately 2.54 acres and is situated in an area zoned for industrial development. The nearest residential property is located approximately 90m to the Northwest of the entrance on the Forge Hill Road. A Proposed Decision (Reg. No. 171-1) from the Agency to develop a similar sized waste facility in this area was recently issued. A notification of decision to grant planning permission (with restricted operating hours) was granted in February 2003. The planning permission is currently under appeal with An Bord Pleanala.

Due to the increased tonnages of waste being transferred through the facility, IPODEC is now applying to the Agency for a waste licence. All non-recyclable waste is currently processed in a temporary transfer area located to the Southeast of the site. This temporary area consists of stacked 40ft containers with net covering to capture litter. The licensee will be required under the recommended Proposed Decision (PD) to process all waste within the proposed waste transfer building within twelve months from the date of the licence been granted or planning permission, whichever is the later. In the past surface water discharges from the facility has shown contamination from these activities and emission limit values under their existing waste permit have been breached. This is further discussed in Section 6 of this report. A submitter (acting on behalf of the City Link Park Management Company Ltd.) has also expressed concerns in relation to existing problems with odour, noise, dust and birds from the facility. These issues are addressed in Section 9 of this report.

The re-development of the site and its infrastructure comprises of the construction of a new administration building located to the south west corner of the site, a residual transfer area and materials recovery facility and associated infrastructure and firewater retention facilities which is further discussed in Section 2 of this report.

The applicant has stated that the maximum quantity of waste handled at the facility when completed will be 82,000 tonnes per annum. Overall 98% of the waste currently handled at the facility derives from commercial and industrial sources.

The applicant has applied for Classes 11,12 (Principal Activity), and 13 of the Third Schedule (WMA 1996) and Classes 2,3,4,12 and 13 of the Fourth Schedule (WMA 1996).

Maximum quantity of waste to be accepted	82,000 tonnes
Environmental Impact Statement Required	Yes. I have assessed it in accordance with the European Communities (Environmental Impact Assessment) Regulations 1999 and it complies with these regulations.
Number of Submissions Received	3

SITE VISITS:

DATE	PURPOSE	PERSONNEL	OBSERVATIONS
16 May 2002	Site notice check	B.Foley	Compliant
4 June 2002	Site & Environs check	B. Foley M. O'Hara	
25 February 2003	Site & Environs check	B. Foley	
16 April 2003	Site & Environs check	B.Donlon B.Foley	

(2) Facility Development

The existing site infrastructure includes a garage/recycling building, offices and a temporary transfer structure. As mentioned in Section 1 all waste transfer activities are currently undertaken externally in a temporary transfer structure. Under the recommended PD all waste processing is required to take place indoors in the waste transfer building within 12 months from the date of grant of the licence or planning permission, whichever is the later. The proposed facility will consist of one enclosed building separated into building 1 (MRF) and building 2 (waste transfer area).

The building (building 1) to house the MRF facility is the current building on site which is to be modified and upgraded by the applicant. The garage, which forms part of the existing building, will be decommissioned and integrated into the proposed MRF. I have concerns relating to the structural integrity and safety of this existing building. From the last site inspection (25/03/03) it was noted that the asbestos cladding on the roof of the building was exposed at the entrance to the truck area. Under Condition 3.4.1 of the recommended PD the applicant is required to investigate the structural integrity and report to the Agency. All recycling operations will be carried out in this building. All baled recyclables will exit via this building.

A new waste transfer extension (building 2) will be attached to the eastern side of building 1. All waste (recyclable and non-recyclable) will initially be deposited in this building. Waste that can be recycled will be processed in the MRF (building 1) via a feed conveyor and sorted there. Building 2 will cater for waste for disposal. The waste transfer trailer loading bay is subterranean to accommodate a rapid transfer from the facility by allowing the grab machine

operator visually see when the loads are full. IPODEC subcontracts the transfer operation to an external company.

The applicant has predicted that approximately 68% of all waste accepted at the facility will be disposed of to other waste disposal facilities but aims to reduce this figure over the years.

The above infrastructure is required to be put in place under the recommended PD (Condition 3.4.2).

The applicant has requested that the hours of operation of the facility to be from 06:00-24:00 hrs Monday to Friday; 06:00 to 18:00 hrs on Saturday and 08:00-18:00 hrs on Sunday. Planning conditions stipulate that the facility shall not be open to receive waste outside the hours of 06:30 to 20:00 Monday to Saturday. These hours have also been included in the recommended PD. The facility can operate during the hours of 06:00 – 22:00 Monday to Saturday. No operations will take place on Sundays or Bank holidays.

(3) Waste Types and Quantities

The applicant has applied to accept 82,000 tonnes per annum of which 70,000 tonnes would consist of commercial waste. The remaining portion is broken down into industrial waste (6,400 tonnes), Construction and Demolition (4,000 tonnes) and household waste (1,600 tonnes per annum).

In 2002 the facility accepted approximately 30,000 tonnes per annum (Waste Permit granted was for 5,000 tonnes), the majority of this being commercial. Approximately 20% of the total accepted was recycled. Overall the applicant handled approximately 45,000 tonnes of waste in the Cork region and the applicant states that this will increase year on year.

(4) Emissions to Air

Expected emissions from the facility are dust, odour and noise and are discussed below.

Dust: Monitoring requirements and an emission limit for dust deposition ($350\text{mg}/\text{m}^2/\text{day}$) are set in order to control any fugitive dust emission from activities on site. The applicant will be required to provide and install an odour and dust management system within the waste transfer building. Waste for disposal is required to be stored in sealed covered containers at the facility and removed off-site within 48 hours of its acceptance at the facility.

Odour: Waste accepted is expected to be the primary source of odours on-site. The odour management system (Condition 7.4) will include the following at a minimum:

- All waste handling activities will be carried out indoors
- The floors of the facility shall be routinely swept and washed down,
- The doors of the building shall remain closed, when not in use,
- An Odour/Dust Control System,
- Storage of waste indoors and in sealed containers-

Removal of waste off-site must occur within forty-eight hours of its acceptance at the facility and seventy-two hours during Bank Holiday weekends.

Noise: emission limits are specified in Schedule C of the recommended PD and limits of $45\text{dB(A)}L_{\text{Aeq}}$ and $55\text{dB(A)}L_{\text{Aeq}}$ are applied for night time and daytime, respectively. Noise monitoring to date at noise sensitive location NS1 (approximately 90m Northwest of the western site boundary of the IPODEC site) has recorded average sound levels at this location in the order of 75dB(A) . This level is in exceedance of the 55dB limit set for noise levels at sensitive locations. The consultants concluded however that this noise was due to traffic noise

measured from vehicles on Forge Hill and no noise from the IPODEC facility was recorded at NS1. The applicant has proposed a number of noise mitigation measures such as the selection of a double skinned Kingspan type cladding system for the roof (Condition 3.4.2). The enclosure of handling operations within dedicated buildings will significantly reduce noise levels emanating from activities at the facility. Condition 6.6 of the recommended PD will ensure that there will be no clearly audible tonal component or impulsive component in the noise emissions from the activity at the noise sensitive locations.

(5) Emissions to Groundwater

The vulnerability rating for the aquifer underlying the IPODEC site is considered to be high to extreme. The thickness of subsoils overlying the bedrock at the site is believed to be in the order of three metres. Condition 3.6.3 of the recommended PD requires the applicant to provide and maintain impermeable hardstanding at the facility in all areas where waste is stored/handled within three months from the date of grant of licence.

Domestic wastewater is discharged to an on-site septic tank and percolation area. It is not known if this septic tank conforms to SR6 or equivalent. The applicant states that the percolation area is located downgradient of general groundwater flow at the facility and monitoring of the groundwater from an on-site well (GW1) used for vehicle cleaning and sanitary use to date has suggested no impact. The applicant has proposed the decommissioning of the septic tank and the connection of the sewerage system on-site to the adjacent local authority foul sewer. Fuel is not stored at this facility. Bulk fuel storage tanks were previously used at the facility but were decommissioned in 2001. Other measures proposed by the applicant to protect groundwater include conducting all waste operations indoors and conducting all waste handling and recycling activities on hardstanding areas. The groundwater well at the facility is required to be monitored (Schedule D).

(6) Emissions to Surface Waters

Currently, surface water from the facility is collected via a network of surface water drains throughout the site. These connect to a manhole adjacent to the site entrance and discharge to a drain, which runs under Forge Hill to a manhole on the industrial site opposite the facility. This ultimately discharges into a small stream, which is a tributary of the Tramore River.

The applicant proposes that all surface water discharges from the site with the exception of roof run-off will be discharged via a Class1 full retention separator to the present surface water system (Conditions 3.13.1; 3.14.1). The applicant is required to carry out surface water monitoring at SW1. The design and operation of the proposed facility will lead to a much-improved control of surface water runoff, compared to the current yard operation.

Monitoring of surface water at the discharge point SW 1 in the past has indicated occurrences of elevated levels of suspended solids (63-198mg/l) and COD (range 63-615mg/l) due to discharges of contaminated run-off from the facility. In addition, an elevated concentration of aluminium (3.12mg/l) was detected in a sample collected in May 2000 and elevated concentrations of petroleum derived hydrocarbons (total – 7.03mg/l) detected as part of a January 2002 sampling event. The applicant linked this contamination to the truck washing activities currently being undertaken at the site, which also discharges to the surface water system via a underground on-site sediment and oil trap. Surface water monitoring results for November 2002 found that with the exception of Total Suspended Solids (212mg/l vs. 30mg/l), all parameters analysed were within the limits specified in IPODEC's waste permit

for discharge to surface water. Elevated concentrations of ammonical nitrogen (1.6mg/l) were noted. No results for aluminium were given.

Surface water monitoring is required to be monitored under Schedule D of the recommended PD.

(7) Emissions to Sewer

The applicant has proposed that all truck wash effluent, wastewater and domestic effluent will be discharged to the Local Authority foul sewer, via a grit trap and oil/water separator (Condition 3.11.1). A cut off point will be installed on the surface water discharge pipe to be used in the event of an incident at the facility. I have proposed that until the applicant is in a position to implement this necessary surface water infrastructure that all wastewater including truck washings be collected and sent to an agreed wastewater treatment plant. This has been conditioned in the recommended PD (Condition 3.11.1). The Sanitary Authority has stated that Section 52 consent is conditional on the applicant getting planning permission for the proposed facility.

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

The Cork Waste Management Plan, which was adopted in 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 proposed development is in line with such provisions.

(9) Submissions

Appendix 2 contains a list of all submissions received relating to the application to date. A summary of the issues raised in the submissions is provided
I have had regard to the submissions received in making my recommendation to the Board.

Submission 1:

1. Traffic and Planning issues:

- Increase in traffic volumes
- Inadequate roads for this increase in traffic
- Re-zoning issues in relation to the facility.
- The submitter also states that Cork Co. Council has recently re-zoned 30 acres or more for new housing and these houses will be within 200 to 300 yards of both IPODEC and Celtic Waste.
- Senior Planner in Cork Council indicated the unsuitability of the plant in this area

Response: *While it is acknowledged that the proposed MRF will result in an increase in traffic on local roads in the vicinity of the development, the Agency is not the relevant authority in relation to roads. Roads and road development are outside the jurisdiction of the Agency. Condition 3.6.1 and 3.6.2 of the recommended PD controls movement of traffic through the facility ensuring that a one way traffic system is maintained and traffic awaiting access to the facility shall not queue along the public road.*

The local authority is the competent authority in relation to planning (land use zoning, planning permission etc). The process of waste licensing is independent of the planning

process. Compliance with the conditions of this recommended PD will control impacts associated with the activities licensed.

Submission 2:

1. Air Quality

Noise

- Concern over increase in noise and noise pollution.

Response: Condition 6 of the recommended PD controls 'Emissions', no clearly audible tonal component or impulsive component is allowed in the noise emissions from the activity at the noise sensitive locations. Under Schedule D of the recommended PD strict noise emission limits are in place. Under Condition 3.4.2 new buildings will be acoustically screened and low noise/equipment plant used where practicable. Compliance with these conditions will control any impacts associated with noise from this activity.

Odours, Dust, Nuisance and Litter

- Concern over problems with odours from putrescible material and the direction of prevailing winds spreading odours onto City Link Park.
- Proposed Operations will generate unacceptable quantities of dust, which will infiltrate City Link Park.
- Nuisance will be caused by vermin; birds, rodents and the problem will increase proportionally with the increase in throughput. Any increase in vermin is unacceptable.
- Windblown litter has the potential to cause significant pollution and will impact negatively on the aesthetics of the site and environs.

Response: The applicant will be required to process waste within an enclosed dedicated building within 12 months from the date of grant of the licence or planning permission, whichever is later. Odour, dust, birds and litter are controlled under Condition 7 'Nuisance Control' of the recommended PD. Condition 5 of the PD 'Facility Operations' provides for the appropriate operation of the facility to ensure protection of the environment.

2. Waste acceptance

- 5000 tonnes is the maximum tonnage of waste that should be allowed.

Response: In condition 1 of the recommended PD 'Scope of the License' the waste tonnage that may be accepted is set out. Under Condition 5 waste acceptance, segregation and off site disposal and recovery is controlled.

3. Visual impact, Site is too confined, increase in traffic and air pollution from increased traffic;

- Concern in relation to increases in traffic
- Decrease in air quality due to increased traffic
- Visual impact in the vicinity of the site and visual impact of traffic movements
- Site is too confined

Response: Matters relating to traffic and planning permission are under the jurisdiction of the planning authority and are not be dealt with in this report. Under Condition 5 'Facility Operations' waste acceptance, segregation and off site disposal and recovery of waste is controlled and provides for the appropriate operation of the facility to ensure protection of the environment.

Submission 3:

- Traffic concerns
- Concerned at the type of business IPODEC was carrying on and implications for him as a supplier

Response: *I have addressed these concerns in response to Submissions 1 and 2 above.*

I recommend that a waste licence, subject to conditions, be granted in accordance with the conditions in the recommended Proposed Decision.

Signed: _____
Brendan Foley

Date: _____

Appendix 1:

Site location Map - **Drawing A.1.1 - Attachment B Application form** and attachments

Site Boundary Map - **Drawing B.2.2 - Attachment B Application form** and attachments