

<b>MEMO</b>			
<b>TO:</b>	Board of Directors	<b>FROM:</b>	Malcolm Doak
<b>CC:</b>		<b>DATE:</b>	21 October 2003
<b>SUBJECT:</b> IPODEC Ireland Ltd., Carrignard, Six Cross Roads, Business Park, Waterford City. Technical Committee Report on Objections to Proposed Decision – Reg. No. 177-1			

<b>Application Details</b>	
Applicant:	IPODEC Ireland Ltd.
Location of Activity:	Carrignard, Six Cross Roads, Business Park, Waterford City.
Reg. No.:	177-1
Proposed Decision issued on:	25/6/03
Inspector:	Breege Rooney

<b>Objections Received</b>	<b>Date Received</b>
Mr. Michael Storan, Environmental Officer on behalf of the applicant.	18/07/03

**Consideration of the Objections.**

The Technical Committee (Malcolm Doak, Chairperson, Brendan Wall, Caoimhin Nolan and Olivia Cunningham (committee members)) have considered all of the issues raised and this report details the Committee’s comments and recommendations following the examination of the objection on this facility.

**OBJECTION No. 1:**

**Mr. Michael Storan, on behalf of the Applicant.**

**GROUND 1**

**Condition 1.6.3**

*IPODEC Ireland Ltd. are requesting to be allowed to accept waste on Bank Holidays in order to retain their customers. While some customers survive not having waste services on Sundays some do demand waste services on a bank holiday due to volumes of waste generated, health and safety grounds or hygiene grounds.*

*While the “licence” does not detail whether the facility can operate on bank holidays the applicant requests the Agency to clarify this point and to allow the operation of the facility on bank holidays.*

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

The Technical Committee (TC) notes that the operation of the facility on a Bank Holiday was not specifically applied for in the licence application, although waste acceptance from Monday to Saturday was applied for. The facility is located in an industrial estate and housing is located approximately 500m to the north. The TC consider that waste should be accepted at the facility on a Bank Holiday as a contingency in the case of public health issues (such as catering for outdoor events), but only with advance notice. The facility should review its procedures on the necessity of accepting waste on a Bank Holiday.

It is recommended that Condition 1.6.3 be amended to clarify that the facility can accept waste on bank holidays if necessary.

### ***Recommendation***

Amend Condition 1.6.3 as follows:-

Waste shall not be accepted at the facility on Sundays. ~~or on Bank Holidays.~~ **Waste shall only be accepted at the facility on Bank Holidays by necessity and with the prior agreement of the Agency.**

## **GROUND 2**

### **Condition 3.5.3**

*IPODEC object to the condition on the basis that the entrance to the facility is already paved with asphalt.*

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

The Technical Committee notes this issue and proposes the following amendment:

### ***Recommendation***

Delete the wording in Condition 3.5.3 as follows:

The licensee shall maintain an impermeable concrete surface at the facility entrance area, at the car parking area, where vehicle movement takes place and at the waste handling and storage area. All concreted areas at the facility shall be constructed to British Standard 8110.

*And replace with the following:*

**The licensee shall maintain an impermeable hardstanding surface at the facility entrance area, at the car parking area, and where vehicle movement takes place. The floor of the waste handling and storage areas shall be concreted and constructed to British Standard 8110.**

## **GROUND 3**

### **Conditions 3.8.1, 3.8.2 & 3.8.3**

*IPODEC consider that the requirement to install a wheel wash is considered excessive and unnecessary. The reasons being that:-*

- *There is a vehicle washing system on site for use as required;*
- *There are no areas of the site where vehicles are moving that will not be hardstanding;*

*IPODEC requests that the words "wheel wash" be removed from condition 3.8.1 and that conditions 3.8.2 and 3.8.3 be removed from the licence.*

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

Given that there is already a wheel cleaning system on site, the Technical Committee is of the opinion that wheel cleaning is needed on an as required basis as per the IPODEC argument. It is also recommended that Condition 3.8.2 be amended to clarify drainage issues.

### ***Recommendation***

Amend Conditions as follows:

#### Condition 3.8.1

The licensee shall provide and maintain a weighbridge and a **wheel cleaner** at the facility.

#### Condition 3.8.2

**The wheel cleaner** shall be used by all vehicles leaving the facility **as required** to ensure that no process water or waste is carried off-site. All water from the wheel cleaning area shall ~~drain to the process water system~~ **be directed to the waste water interceptor.**

#### **Delete Condition 3.8.3**

## **GROUND 4**

### **Condition 3.11.1**

*IPODEC argue that the requirement to upgrade the existing system of grit traps and bypass interceptors to two full retention interceptors is unnecessary given that previous monitoring of the levels of contaminants in the final discharge 'are not significant'. IPODEC requests that the Agency reviews these requirements.*

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

It is noted that surface water run-off from the facility currently discharges into a dyke (which discharges to the St. John's River) via a Class I Bypass interceptor. A shut-off valve in the discharge line to the dyke has been provided for dealing with emergency flooding. The Technical Committee are of the opinion that the facility should be capable of retaining both wastewater and contaminated surface water in a flood event, or spillage on-site, without the need for a bypass into the dyke. It is recommended that the condition should not be changed but that the timescale be amended to provide the licensee six months for installation.

### ***Recommendation***

Amend Condition 3.11.1 as follows, by adding the text in bold and amending the current typographical error in italics:-

**Within six months from the date of grant of this licence,** the licensee shall install and maintain silt traps and oil interceptors at the facility to ensure that all contaminated surface water discharges and wastewater from the facility pass through a silt trap and oil interceptor prior to discharge. The surface water interceptor shall be a Class I full retention interceptor and the wastewater interceptor shall be a ***Class II full retention interceptor***. The silt traps and interceptors shall be in accordance with European Standard EN 858 (installations for the separation of light liquids).

## **GROUND 5**

### **Condition 4.2.2**

*IPODEC consider that it will not be possible to inspect all loads of waste at the point of entry since most waste arriving on-site will be in 'Rear-end-loaders' which are closed units and difficult to open unless the contents are tipped. IPODEC request that the words 'inspected at the point of entry to the facility and subject to this inspection' be removed.*

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

The Technical Committee notes that the term "inspection" can mean a visual check, an assessment whether the waste is on fire, or whether there are odours arising, etc. It also means checking the vehicles entering in order to record the details specified in Condition 9.2.

#### ***Recommendation***

No Change
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## **GROUND 6**

### **Condition 4.2.6**

*IPODEC consider that the wording of this condition will prevent the transport of waste to the facility from private companies or businesses where waste is produced at their own site such as restaurants or shops etc.*

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

The Technical Committee notes that Article 22 of the Waste Management (Collection Permit) Regulations 2001 (SI No. 402 of 2001) provides exemptions (in some cases) from the requirement to hold a waste collection permit. Therefore the examples IPODEC uses will not be prevented from transporting waste from their premises. However, the Technical Committee wish to amend the condition to clarify the language to:

#### ***Recommendation***

Delete the wording in Condition 4.2.6 as follows:-
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Waste shall only be accepted at the facility, from customers who are holders of a waste permit under the Waste Management (Collection Permit) Regulations 2001 or from other licensed/permitted facilities.
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<i>And replace with the following:</i>
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<b>Waste shall be only accepted at the facility from holders of a waste collection permit, unless exempted under the Waste Management (Collection Permit) Regulations 2001.</b>
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## **GROUND 7**

### **Condition 4.3.1**

*IPODEC are objecting to washing down the floor of the transfer building on a daily basis since they handle a predominantly dry waste. It is contended that daily washing only increases the volume of water being discharged to the foul sewer. IPODEC detail that they operate other successful odour control measures, other than washing the floor, at their Dublin facility as an example. They would be satisfied to clean the floor on a weekly basis to meet with the Agency's concerns.*

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

The Technical Committee note that the wording of the present condition only requires daily washing down to be done in areas used for the handling of putrescible waste. To provide clarification, the TC recommend that the wording of the condition be amended as follows:

### ***Recommendation***

Delete the wording in Condition 4.3.1 as follows:-

The floor of the waste transfer building, where putrescible waste is handled, shall be washed down and cleared of all waste at least once every 24 hours and a written record maintained. The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied.

*And replace with the following:*

**The floor of the waste transfer building shall be cleaned on a weekly basis and on a daily basis where putrescible waste is handled. The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied, or as a minimum on a weekly basis.**

## **GROUND 8**

### **Condition 6.4.3.2**

*The above condition is written in the context of air handling/ventilation plant which the facility does not have. IPODEC request the Agency deletes this condition.*

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

The Technical Committee note that the odour management system specified in Condition 6.4.3.1 may require air handling equipment etc. to be installed in the future. Therefore the Technical Committee recommend that the condition is amended to make provision for such:

### ***Recommendation***

Amend Condition 6.4.3.2 as follows:-

Provision of 100% duty capacity and 50% stand by capacity, back ups and spares must be provided for ~~the~~ **any** air handling, ventilation and abatement plant.

## **GROUND 9**

### **Condition 10.6.1**

*IPODEC note that the AER refers to a Schedule H of the licence, for which there is none.*

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

The Technical Committee notes the typographical errors in relation to the numbering of sub-conditions under 10.6 (i.e. there are two sub-conditions numbered 10.6.1), and the reference to Schedule H, and recommends the following:

***Recommendation***

Amend the numbering of the second sub-condition under Condition 10.6 to read as **10.6.2**.

Amend Condition 10.6.2 as follows:-

The AER shall include as a minimum the information specified in Schedule **H F**: Content of Annual Environmental Report and shall be prepared in accordance with any relevant written guidance issued by the Agency.

**GROUND 10**

**Condition 11.1.1**

*IPODEC believes that the fee of €15,607 is excessive given that their facility in Dublin (39-2) has paid approximately €13,500 for 2003. Hence, IPODEC request that the Agency reduce the fee to at least the same amount if not less.*

***Technical Committee's Evaluation***

It should be pointed out that the monitoring charge is based on the cost of carrying out Agency monitoring of the facility including site inspections, audits and assessing reports and laboratory analysis of samples taken at the facility.

The Technical Committee examined the charges in relation to this facility and note the facility size and annual tonnage intake of c. 25,000T. The Technical Committee consider that the number of days required to assess reports should be reduced. This has the overall effect of reducing the charges to €13,829.

It should be noted that the charge will be reviewed on an annual basis. This charge will be reduced or increased, taking into consideration the Public Sector Average Earnings Index and the enforcement workload for the licence.

The Technical Committee recommends reducing the annual contribution to the Agency from €15,607 to €13,829.

***Recommendation***

Amend annual contribution in Condition 12.1.1 to €13,829.

Signed: \_\_\_\_\_  
Malcolm Doak  
Technical Committee Chairperson

Dated: \_\_\_\_\_  
21 October 2003.