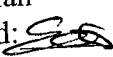


Check file provided for submissions

This Report/Memo has been cleared for submission to the Board by the Programme Manager,

P. Nolan

Signed: 

Date: 10/1/06

OFF LICENCE GUIDANCE



INSPECTORS REPORT ON A LICENCE APPLICATION

To:	SUB BOARD
From:	PERNILLE HERMANSEN - LICENSING UNIT
Date:	6/01/06
RE:	APPLICATION FOR A WASTE REVIEW LICENCE FROM GREENSTAR LIMITED, LICENCE REGISTER 53-3

Application Details

Type of facility:	Integrated Waste Management Facility
Class(es) of Activity (F = principal activity):	3 rd Schedule: 11, 12 and 13 4 th Schedule: 2, 3, 4, 11, 12 and 13
Quantity of waste managed per annum:	200,000 tonnes
Classes of Waste:	Household waste, commercial waste, construction and demolition waste and hazardous waste.
Location of facility:	Fassaroe, Bray, County Wicklow
Licence application received:	10/09/04
Third Party submissions:	5 submissions
EIS Required:	Yes
Article 14 Notice sent:	3/06/05
Article 14 compliance date:	19/10/05
Article 16 Notice sent:	3/06/05
Article 16 Compliance date:	22/11/05
Site inspection:	Site notice inspection 23/9/04 by PH. Site notice compliant.

■ Facility

This report relates to an application by Greenstar limited for a review of the existing Waste Licence (Reg. No. WL 53-2 issued 3/04/03). The existing licence (WL 53-2)

was issued to Noble Waste Disposal Limited now trading as Greenstar Limited (formerly Celtic Waste Ltd.).

The facility is currently licensed to operate a non-hazardous waste transfer station accepting 129,502 tpa consisting of household, commercial, construction and demolition wastes and hazardous waste. The existing license also requires that the closed on-site landfill be reclaimed and restored.

The facility is surrounded by a mixture of agricultural, quarrying, commercial and residential use. There are approximately 17 residences within 250m of the site. The nearest residences are located along the southeastern facility boundary. The existing transfer station building is approximately 65 m from the nearest residence. Other areas where waste is processed are at least 100 m away from the nearest residence. All other sides are surrounded by either scrub or agricultural land. There is a sand and gravel quarry about 400 m to the south west operated by Roadstone used mainly as a brick and block depot.

The applicant initiated the review process to allow for the installation of a proposed biowaste treatment facility accepting 10,000 tpa. In addition the applicant has proposed to amend several conditions of the existing licence.

The applicant has sought waste acceptance on a twenty four hour a day basis from Monday to Sunday inclusive and to allow waste acceptance on Bank Holidays. The applicant proposes to operate outside the current licensed operation hours inside the newly constructed waste transfer building (Phase I). The RD does not allow for this proposal.

The RD sets the hours as shown below:

Hours of Operation	7:30 to 19:00 Monday to Saturday inclusive
Hours of Waste Acceptance	7:30 to 18:00 Monday to Saturday inclusive

2. Operational Description

The applicant has proposed an increase in the quantity of waste accepted at the facility from 129,502 to 200,000 tpa consisting of household waste (38,600 tpa), commercial waste (104,960 tpa), construction and demolition waste (54,040 tpa) and hazardous waste (2,400 tpa). The RD allows for this (Schedule A).

Several different operations will be carried out at the facility: bulking of municipal solid waste prior to transfer off site for disposal, composting, wood shredding, processing/storage of dry recyclables, recovery of construction and demolition waste, acceptance and storage of the waste at civic waste facility to include acceptance of hazardous waste.

The hazardous wastes proposed for acceptance at the proposed civic waste facility are asbestos (2,000 tpa), chlorofluorocarbons (200 tpa) and WEEE (200 tpa). The asbestos proposed for acceptance will be bonded asbestos waste material with the assigned EWC code 17-06-05* - *construction materials containing asbestos*. The RD specifies the requirement for correct handling/storage of asbestos material at the facility (Condition 8).

Biowaste Treatment Facility

The existing licence allows composting of 2,000 tpa at a trial composting area. Trial composting has never been carried out at the facility. The applicant now proposes to locate a biowaste treatment facility at the northwestern corner of the facility and to increase the quantity for composting to 10,000 tpa of green waste, food waste and other waste capable of being biologically treated. The applicant states that the nearest occupied residences is about 280m away from the proposed composting facility. Wicklow County Council granted planning permission on 5/7/05 for the construction of the biowaste treatment facility.

The proposed biowaste treatment facility will comprise of:

1. A waste reception building where biowaste will be stored (maximum 40 tonnes per day) and mixed with wood chip.
2. Ten concrete in-vessel biowaste treatment tunnels with air being delivered to the tunnel through aerated floor with the exhaust air drawn out through the roof for treatment in a biofilter.
3. Six vacuum aerated static piles (ASPs) where the compost will be cured for 6-8 weeks. At the ASP the air is drawn under vacuum through the maturing biomass to maintain aerobic activity. The air is re-pressurised and forced through a biofilter to remove any residual odours.
4. A screening & product storage area where a trommel will be used to further process the compost. The area will allow for the storage of maximum 150m³, one weeks production.

The applicant states that a maximum of 1,722 tonnes will be treated at any one time at the biowaste treatment facility. The applicant proposes to fill one tunnel every working day over a two week period.

Condition 3 of the RD allows for the installation of the biowaste treatment facility as proposed by the applicant. However the screening of compost shall be carried out indoors to ensure dust emissions are minimised and ASPs shall be covered to minimise any windblown debris (Condition 8).

Commercial and Industrial Waste Recovery Area

The applicant proposes to move the industrial and commercial waste processing facility inside Phase I transfer station building. The RD requires that all waste processing except wood shredding and composting shall be carried out indoors from the date of grant of this licence (Condition 8).

Construction and demolition waste recovery area

The existing licence requested that processing of C&D waste and non-putrescible commercial/industrial waste should be moved indoors within two years of the date of grant of this licence or when Phase 2 had been built whichever was the earlier i.e. 3/4/05. At the time the applicant proposed to house the C&D waste recovery facility within Phase II transfer station building when constructed. According to the applicant Phase II has been delayed due to protracted negotiations with Bord Gais. in relation to the gas pipeline along the eastern facility boundary. The applicant now proposes to start construction of Phase II in February 2006 with a completion date of February 2007. Wicklow County Council has granted planning permission for Phase II on 24/11/03.

3. Use of Resources

The applicant has included details on raw material and energy consumption per annum as follows: Diesel 277,343 litres and Electricity 13,600 KWh.

Condition 7 requires the applicant to carry out an audit of the energy efficiency of the site. Reduction of energy use and water usage as well as use of raw materials shall be identified and incorporated into the Schedule of Environmental Objectives and Targets.

4. Emissions

4.1 Air

Landfill Gas

The applicant states that landfilling has been carried out at the site between 1947 and 2000. Prior to 1995 no records were kept of the waste deposited at the site. Since 1995 approximately 350,000 tonnes of inert waste material has been deposited at the facility.

The landfill gas monitoring carried out by the Agency on 16/2/05 (site report attached SI01DS) showed an exceedance of CO₂ in five of the six perimeter boreholes monitored ranging from 2.4 to 5.1% v/v. The trigger level for methane was not exceeded in the perimeter boreholes. In the boreholes within or close to the edge of the fill area CO₂ measured ranged from 3.2 to 13.7% v/v. Methane was detected in one of the boreholes within the fill area (GS-10 1.8% v/v). The applicant states that monitoring in the site building has not detected the presence of any landfill gas.

The applicant proposes to remove the requirement for a permanent gas monitoring system to be installed in all existing and proposed enclosed structures. The existing license (53-2) stipulates that this monitoring system shall be installed within three months of the date of grant of this licence. For any new building built on gas tight concept (sub floor membrane and/or ventilation) the requirement for permanent gas monitoring is difficult to justify. Having regard to the low methane risk and modest CO₂ risk (low evolution) the RD stipulates that in the older buildings on site (those without gas proofing membranes or drainage layers in the foundation), periodic gas monitoring shall be carried out with mobile equipment or equivalent as agreed by the Agency (Condition 6). Gas proofing measures shall be agreed as part of SEW for any new building to be constructed on site (Condition 3 and Schedule D).

Schedule C sets the monitoring requirements for landfill gas. The trigger levels for landfill gas are set out in Condition 5 of the RD. The landfill gas concentration limit values in buildings are set out in Schedule B of the RD.

Odour

Condition 6 of the RD stipulates that odour control shall be installed and maintained at the facility within twelve months of the date of grant of this licence, except at the biowaste treatment facility where the measures shall be provided prior to commencement of composting being carried out at the facility. Furthermore Condition 6 requires that buildings where putrescible waste is processed shall be maintained under negative pressure with ventilated gases being treated as specified by the Agency. All process air from the reception building, in-vessel units and the ASPs will be collected and treated in biofilters as proposed by the applicant (Condition 6).

The RD requires that the composting process be monitored to include continuous monitoring of temperature and oxygen content (Condition 6 and Schedule C).

Schedule C sets the monitoring requirements for emissions to air from the biofilters. Schedule C also requires that the biofilters be monitored to include assessment of the bed media and monitoring of inlet/outlet gas.

Bioaerosols

Condition 6 of the RD specifies that bioaerosols monitoring shall be carried out at the facility in accordance with Schedule C.

4.2 Emissions to Sewer

A Section 52 consent has been obtained from Wicklow County Council (WCC). Consent conditions and sanitary authority charges requested by WCC have been added to the RD (Conditions 5 and 12).

The applicant proposes to discharge existing trade and sanitary effluent to a new foul sewer being installed on lands adjacent to the facility (the existing drainage network is described in the Inspector's Report accompanying the existing licence WL 53-2). Condition 3 of the RD specifies the required drainage network at the facility. Sanitary effluent will be discharged directly to foul sewer. The trade effluent will discharge via a petrol/oil interceptor to the new sewer which connects to the municipal sewer that outfalls to the municipal wastewater treatment plant in Bray.

At the proposed composting facility, the trade effluent generated will be collected in holding tanks and reused in the composting process. The trade effluent generated at the reception building and the in-vessel units will be discharged to a holding tank for recirculation at the blending stage. Run-off from the **ASPs** will be directed to a holding tank for settling and subsequent recirculation to the **ASPs**. Any surplus trade effluent/leachate will be directed from the holding tanks to a surplus storage tank and tankered off-site to an agreed wastewater treatment plant (Condition 3). The storm water run-off from the screening and compost storage area will be directed to a holding tank for reuse and surplus run-off will be directed to soakways via an interceptor.

Automatic cut-off valves will be installed on both the foul sewer drainage system and the storm water drainage network to prevent any accidental discharge of polluted water (Condition 3).

4.3 Emissions to Surface Waters

There is only indirect discharge to surface water via the soakways that take clean storm water run-off from the site.

The Glenmunder river runs along the northern facility boundary. The Glenmunder river discharges into a designated salmonid river, the Dargle river. Condition 5 of the RD specifies that no trade effluent, leachate or polluted storm water shall be discharged to the surface water drains and surface water courses.

Surface water monitoring in Glenmunder river from 2001 to 2004 shows elevated levels of ammonia and nitrite both in upstream and down stream samples. A biological assessment carried out assigned a Q-value of 3-4 to both upstream and downstream location, with marginally better conditions at the downstream monitoring point.

4.4 Emissions to ground/groundwater:

The aquifer beneath the site is not a regionally important aquifer and is not used locally as a source of groundwater supply. The only indirect discharge to groundwater

is from the soakways taking storm water run-off from paved and roofed areas and the percolation area serving the existing septic tank (to be decommissioned).

The ground water monitoring has not identified any significant impact on groundwater quality associated with facility activities apart from the impact on water quality in borehole BH-5 which is attributed to the on-site septic tank system. Following the connection to the foul sewer the septic tank will no longer be used which should have a positive impact on groundwater quality.

All fuel tanks and oil storage compounds are bunded.

Schedule C sets the groundwater monitoring requirements. The RD allows for the monitoring of a new up-gradient borehole (P-BH-6) instead of borehole BH-6 which will be decommissioned due to the changes to the site boundary.

4.5 Noise:

The applicant has submitted results from the most recent noise survey conducted on 18/5/04. Measurements were carried out at 4 designated noise monitoring locations (N1, N2, N3 and N4) and two noise sensitive locations (NSL1 and NSL2). The monitoring results shows exceedances of the daytime noise emission level set in the existing licence (WL 53-2) at two of the boundary locations (N1: 65 and 66 dB LAeq; N2: 69 and 72 dB LAeq) and at both of the noise sensitive locations (NSL1: 65 dB LAeq; NSL2: 65 dB LAeq). All of the locations resulting in exceedances of the set noise emission level are located near the site entrance along the south eastern boundary. The applicant details the sources contributing to the noise levels N1: traffic in and out of the site; N2: traffic movement around the site and on-site construction; NSL1: construction off-site, machinery and traffic at the site and traffic in and out of the site; NSL2: same dominant sources as a NSL1. The two monitored noise sensitive locations are two dwellings located 20m apart adjacent to the site entrance at the south eastern boundary of the facility.

The applicant states that the noise survey was carried out during normal operations but does not detail whether all the processing plant outdoors were in operation during the survey. The submissions from nearby residents (detailed below) indicate that the residents have concern about elevated noise levels from the outdoor processing areas. As detailed above the RD requires that all waste processing shall be carried out indoors from the date of grant of this licence (Condition 8). The RD also requires the applicant to submit a proposal for further reduction of noise impact by the use of strobe lights in addition to a muted siren or 'smart alarm' systems (locally directed reversing tones that self adjust volume according to ambient noise) (Condition 6). The applicant shall also carry out a feasibility study to assess the benefits of installing acoustic cladding on all waste processing buildings (Condition 6).

Furthermore the RD stipulates that within 3 months of the date of grant of this licence, the applicant shall submit an updated noise monitoring programme to include the location of noise sensitive locations along Thornhill Road north of the facility (Condition 6 and Schedule C). This will require the applicant to carry out monitoring at the two dwellings – The Ochra and Glenfield mentioned in the submissions below.

The applicant has submitted a noise assessment of the proposed biowaste treatment facility and the impact on three noise sensitive locations at the south eastern boundary. The model shows predicted noise levels below the daytime and night time noise emission limits set in the RD (Schedule B).

4.6 Nuisance:

The applicant has submitted the following dust monitoring results from June 2004 to January 2005:

Monitoring Location	Jun-Jul	Aug – Sept	Nov-Dec	Dec -Jan
DS-1 (mg/m ² /day)	Gauge contaminated	1690	82	202
DS-2 (mg/m ² /day)	332	488	135	359
DS-3 (mg/m ² /day)	Gauge contaminated	368	167	272
DS-4 (mg/m ² /day)	Gauge damaged	1220	2555	Gauge damaged

The applicant attributes the exceedance during November – December 2004 at DS-04 to gauge location near the commercial and industrial waste processing area. The other outdoors waste processing areas are also located in the same area as the commercial and industrial waste processing area. The applicant attributes the exceedance of dust deposition rate in December – January to extremely windy weather conditions.

The dust monitoring results indicates a serious problem with waste management procedures at the facility. The RD therefore stipulates that all waste processing shall be carried out indoors except shredding of wood (Condition 8). However the wood shredder shall be enclosed within 9 months of the date of grant of this licence (Condition 3).

The existing licence stipulates that the shredder shall not be operated when wind speeds exceed 14 m/s (Force 7). Met Eireann describes Force 7 (Beaufort scale of wind force) as near gale. I consider that the wind speed is set at too high a level for proper dust/litter management at the facility. Condition 6 of the RD specifies that the wood shredder, prior to being enclosed, shall not be operated when wind speeds exceed 10.7 m/s and Force 5 (fresh breeze; Beaufort scale of wind force).

It is not anticipated that the proposed biowaste treatment system will be a source of dusts due to the high moisture content of biodegradable waste at acceptance (about 50%) and all stages of the composting process (40 –70%). Furthermore the waste is to be accepted inside a building with negative air pressure system and an air collection and treatment system. The RD specifies that screening of compost shall be carried out indoors and not outdoors as proposed by the applicant (Condition 8). Condition 6 of the RD requires that additional dust monitoring points are installed at the northern boundary and the western boundary prior to composting activity commencing at the facility.

The RD requires that adequate litter control measures be applied at the facility (Condition 6). Litter fencing shall be maintained at the facility until all outdoors waste processing have ceased.

5. Restoration

The existing licence (WL 53-2) requires that the restoration of the landfill area at the facility be completed by April 2006. The applicant states that the restoration of the site has been delayed due to protracted negotiations with Bord Gais in relation to the protection of a gas pipeline running alongside the eastern site boundary. The applicant proposes an extension to the timeframe for completion of the site restoration from April 2006 as set in the existing licence to April 2009. The RD allows for this. Condition 10 of the RD requires that a Closure, Restoration & Aftercare Management Plan (CRAMP) be prepared and reviewed annually to allow for any proposed amendments to the plan to be agreed by the Agency (Condition 10).

The applicant has revised the restoration profile along the eastern bank sloping down to Glenmunder River after receiving written agreement from Bord Gais. Condition 10 of the RD allows for the revised restoration profile along the eastern site boundary as proposed by the applicant.

The capping details of the existing licence is as specified for non-hazardous biodegradable landfill in the *Agency Landfill Manual Landfill Site Design*. The applicant has proposed the following amendments to these capping specifications:

- *Landscaped areas:* 1-2m of subsoil and 0.25-0.5m topsoil
- *Hardstand areas:* 1-2m of subsoil and 0.25-0.5m stone sub-base and concrete/tarmacadam finish

The Landfill Directive, Annex I, Paragraph 3.4 states that requirement for surface sealing (capping) can be reduced if on the basis of environmental risks the competent authority has established that the collection and treatment of leachate is not necessary or the landfill poses no potential hazard to soil, groundwater or surface water.

The applicant states that the monitoring data supports anecdotal evidence that construction and demolition waste comprising of mainly subsoil and stone was landfilled at the facility from 1947 to 2000. As detailed above in Section 4.1 the monitoring of landfill gas indicates a low methane risk and modest CO₂ risk. Furthermore the surface water monitoring and groundwater monitoring does not indicate that the landfill is impacting on the adjacent Glenmunder stream or on the local aquifer (see Sections 4.3 and 4.4). Condition 10 of the RD allows for the final capping to be installed as proposed by the applicant.

6. Cultural Heritage, Habitats & Protected Species

The applicant states that there are no recorded monuments located within the boundaries of the proposed development area nor were any sites detected during field walking. There will be no direct impact on any of the known archaeological sites recorded in the Sites and Monuments Records for County Wicklow according to the applicant.

The applicant has listed 13 areas of conservation within 10km of the facility boundary. The closest designated site to the facility is Ballyman Glen which is located about 0.75km to the north. This site is a candidate SAC selected for alkaline fen and petrifying springs. It is not expected that there will be any impacts from the facility on these areas of conservation.

The applicant refers to the regional waste management plan *Wicklow Waste Management Plan 2000-2004* stating that the plan acknowledges the waste management infrastructure deficit in Wicklow and the need for increased capacity in order to meet targets set out in the plan. The overall policy being to “move quickly to a maximum recycling scenario, which will meet the wishes of the public and also meet the mandatory targets for recycling set out by Government.”

8. Environmental Impact Statement

I have examined and assessed the EIS and am satisfied that it complies with the EIA and Waste Licensing Regulations as per Article 14 letter of acknowledgement.

9. Compliance with Directives/Regulations

The facility does not fall under the scope of the IPPC Directive or the Landfill Directive. In relation to the Groundwater Directive, the facility will not have any direct emission to groundwater.

Condition 1 of the RD stipulates that the applicant must satisfy the Agency that consent has been obtained from the Department of Agriculture and Food to treat animal by-products.

10. Compliance Record

At the last audit of the facility carried out by the Agency on 5/11/04 nine non-compliances and nine observations were noted (Audit report attached). Four of the non-compliances were in relation to the outdoors waste processing area. The non-compliances were: no installation of hardstanding area at the waste processing area, acceptance of putrescible waste at the outdoors processing area, public allowed access to the outdoors waste processing area and waste stored outdoors for longer than the specified timeframe of two months as set in the licence. Another non-compliance was issued in relation to non-notification of incident in relation to malfunctioning of an on-site wastewater treatment system resulting in wastewater being tankered off-site for a two month period. The other non-compliances were issued in relation to infrastructure such as monitoring boreholes not being maintained or installed, wheelwash not installed and permanent gas monitors not installed.

In addition it should be noted that the existing licence requires that waste processing of C&D waste and non-putrescible commercial/industrial waste shall be carried out indoors at the latest date of 3/4/05. The waste processing of these waste types are still carried out outdoors at the facility.

11. Fit & Proper Person Assessment

Offences and Convictions

In 2002 Noble Waste Disposal Limited (Waste Licence 53-1) now trading as Greenstar limited was convicted on 7 charges for non compliances with their existing

licence under the Waste Management Act, 1996 (for further details see the Inspector's Report accompanying the existing licence WL 53-2).

In 2003 N. Murphy Waste Disposal Limited (Waste Licence 134-1) now trading as Greenstar Materials Recovery Ltd was convicted on two charges. The charges related to acceptance of waste types not allowed for under the licence and transfer of waste to an inappropriate person. Total fines and costs imposed was €7,330 (fine imposed €500).

The prosecutions relate to period very shortly after the take over by Greenstar limited. It is recognised that the new owners faced some challenges in bringing the site into compliance on takeover.

Having regard to the positive developments on the applicant's site since the prosecution, I am of the view that the applicant is applying the necessary changes to operational and management practices sufficient to allow the Agency to avail of the provision set out in Section 40(8) of the Waste Management Acts to deem the applicant, in the case of this application, to be Fit and Proper for the purposes of Section 40(7)(a).

Technical Competence & Site Management

The applicant states that it is not proposed to amend the current management structure at the facility.

Financial Provision

The audited accounts for 2003 and 2002 were supplied with the application.

In the ELRA 2003 submitted as part of the review waste application the applicant states that the financial provisions in place to address any environmental liability include insurance cover to the sum of €6,350,000 for any one occurrence.

Condition 12 of the RD requires the applicant to provide an annual statement detailing the measures in place in relation to the underwriting of costs for remedial actions following anticipated events (including closure) or accidents/incidents as may be associated with the carrying on of the activity. The applicant shall submit a revised comprehensive and fully costed ELRA (Condition 12).

12. Submissions

There were five submissions made in relation to this application.

12.1 Submission from Mr Philip Lardner, The Ochra, Thornhill Road, Bray, County Wicklow

Mr Lardner states that he lives about 150-200m away from the facility and is directly affected by the daily operations of the facility. Mr Lardner raises the following issues in his submission.

(i) - Dust and Litter

Mr Lardner states that the continued outdoors waste processing and non use of effective screening is causing litter and dust nuisances. Mr Lardner states that the dust and litter from these operations are so bad that he cannot open any doors or windows.

Mr Lardner notes that wood shredding is allowed at force 7 in the existing licence (WL 53-2) which is a moderate gale. He asks for reduction of the wind speed limit to Force 3 or less,

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Mr Lardner states that he strongly feels that the waste processing outdoors should not be allowed to continue any longer.

Comment:-Condition 8 of the RD states that all waste processing shall be carried out inside the waste transfer building(s) at the date of grant of this licence. Composting shall be carried out at the biowaste treatment facility with all incoming waste for composting being accepted inside the reception building. Screening of compost shall be carried out indoors. The wood shredder shall be enclosed within nine months of the date of grant of this licence (Condition 8). Prior to enclosing the wood shredder the shredder shall not be operated when wind speed exceed 10.7 m/s (Force 5) (Condition 6), which is a lower than the set wind speed in the existing licence (WL 53-2).

(ii): *Noise*

Mr Lardner states that the processing of C&D waste outdoors generate an objectionable level of noise that can be clearly heard inside his house with the doors and windows closed and even with the TV on. The reversing sirens on plant/machinery is particularly penetrating and aggravating according to Mr Lardner.

Mr Lardner has measured noise levels from the facility at his home on a random day with little wind; the average continuous noise level never dropped below 65dB(A) and often reached 75dB(A).

Furthermore Mr Lardner requests that the Agency make it a condition that the shed doors remain closed at all times when not directly moving materials into or out of the buildings.

Comment:-As mentioned above C&D waste processing shall be carried out indoors from the date of grant of this licence (Condition 8). In addition the wood shredder shall be enclosed within 9 months of the date of grant of this licence. These changes in waste management at the facility should ensure a reduction in noise emitted from the facility plant.

Condition 6 of the RD requires that dust curtains shall be installed on entry/exit points at the waste transfer buildings with all other doors of these buildings kept closed where possible. At the biowaste reception building the doors shall remain closed at all times other than to facilitate the delivery/removal of wastes from the building.

Condition 6 of the RD requires that the applicant submit a proposal for agreement by the Agency for further noise reduction measures to be installed at the facility such as "smart alarms". The applicant is also required to carry out a feasibility study to assess the benefits of installing acoustic cladding on all waste processing buildings (Condition 6).

(iii) *Lighting*

Mr Lardner states that the lighting at the facility is excessive and particularly badly aimed leading to an objectionable level of light pollution into the surrounding countryside and homes. Mr Lardner states that the lights shine directly onto the front and side of his home and can still be seen through drawn curtains at night. Mr Lardner states that the lighting from the facility prevents him from enjoying his, principle hobby of astronomy and astrophotography. Mr Lardner notes that he has on several occasions asked that the floodlights be properly aimed but no action has ever been taken.

Comment:-Condition 6 requests that the applicant to the satisfaction of the Agency revise the lighting arrangement on-site particularly with respect to light sensitive areas (northern boundary) during night time hours.

(iv) *Visual appearance*

Mr Lardner states that the facility is particularly unsightly given its location relative to the beautiful view of the two Sugarloaf Mountains, the Glen of the Downs and Glencree.

Comment:- The issue of the visual appearance of the facility is an issue for the Planning Authority and outside the remit of the Agency.

(v) *Hours of Operation*

Mr Lardner states that hours of operation in the existing licence (WL 53-2) permits the facility to operate between the hours of 7:30 to 21-00 Monday to Saturday which is an increase in the operational hours set in the original waste licence (WL 53-1). Mr Lardner states that the applicant often operates the facility outside these hours as late as 23:30. Mr Lardner requests that the Agency address this problem and return the hours to their earlier limits: 7:30 to 18:00.

Comment:-The applicant has proposed an extension of the current hours at the facility to allow for operation on a twenty four hour a day basis from Monday to Sunday inclusive and to allow waste acceptance on Bank Holidays. Furthermore the applicant proposes to operate outside the current licensed operation hours inside the newly constructed waste transfer building. The RD sets the operational hours to 7:30 to 19:00 on Monday to Saturday inclusive (Condition 1).

(vi) *New Composting Facility*

Mr Lardner states that based on a visit to an IPODEC compost depot outside Waterford City, he would encourage the Agency to promote this method of household/garden waste treatment.

Mr Lardner makes two comments on the proposed biowaste treatment facility:

- 1. The ASPs should be covered with a permeable cover to prevent plastics from blowing away and birds from picking over the material. Mr Lardner states the cover would also help to minimise odours emanating from the ASPs.*
- 2. The biowaste treatment facility should be redesigned so all operations are carried out indoors which would decrease the potential nuisances from dust, litter and noise.*

Comment:-Condition 8 of the RD requires that a cover be maintained over the ASPs to avoid nuisances such as litter.

Considering the relatively small amount of waste to be composted at the facility – 10,000 tpa (Condition 8) it is considered adequate to allow for the in-vessel units and the ASPs to be placed outdoors as the air is collected and treated by biofilters. However the waste acceptance and mixing of waste and feedstock shall be carried out inside the reception building at the proposed biowaste treatment facility.

12.2 Submission from Dr Noreen Keane, Glenfield, Thornhill Road, Old Connaught, Bray, County Wicklow

Dr Noreen Keane states that her submission relates mainly to noise pollution. Dr Keane states that the noise has ruined what was once a peaceful semi-rural area and it now promises to deteriorate further with the proposed continuation of outdoors processing of waste in greater volumes.

Dr Keane has attached three letters addressed to the applicant (dated 13/7/01), the Agency (dated 22/2/00) and Wicklow County Council (dated 22/2/00) to document their complaints made in relation to Greenstar ltd (then trading as Celtic Waste). Furthermore Dr Keane states that the applicant has not recorded a noise complaint made in April 2004 in their complaints record (AER 2003-2004).

Dr Keane refers to conditions in the existing licence (WL 53-2) proposed to be amended as detailed below:

(i) *Condition 1.4*

Dr Keane notes that Greenstar has applied for an almost 50% increase in all types of waste accepted which she considers inappropriate as the applicant is still not in compliance with Condition 5.1 of the existing licence (WL 53-2) i.e. C & D waste processing machinery is not housed.

Comment:-See Section 12.1 (i) above.

(ii) *Condition 1.6*

Dr Keane notes that the applicant has applied for an extension of the hours at the facility which she considers inappropriate as the applicant is still not in compliance with Condition 5.1 of the existing licence (WL 53-2) i.e. C & D waste processing machinery is not housed.

Comment:-See Section 12.1 (v) above.

(iii) *Condition 5.1.1*

Dr Keane states that it is with this condition she takes the greatest issue as Greenstar ltd. would now seem to be requesting continuation of outdoor processing. She adamantly disputes the statement by applicant that there are "no overriding environmental reasons" why the applicant should not continue their current practice of outdoor C&D waste processing. Dr Keane states that none of the noise monitoring locations are relevant to her house or her neighbours at the northern boundary nor are there any monitoring points near the west end where C&D waste is processed.

Dr Keane notes that noise recording carried out by her indicates elevated noise levels above the noise emission limits set in the existing licence (WL 53-2).

Comment:-The RD does not allow for processing of C&D waste outdoors from the date of grant of this licence (see Sections 2, 4.6 and 12.1(i) above).

Condition 6 of the RD states that within 3 months of the date of grant of this licence, the applicant shall submit an updated noise monitoring programme to include the monitoring of noise sensitive locations along Thornhill Road. This condition will allow for noise monitoring at Dr Keane's residence and her neighbour Mr Lardner's

residence (see submission above) to ensure that the facility is not causing any elevated noise levels outside the facility boundary.

tunnels should be contained within the reception building from the very start to reduce problems of outdoors noise and odours.

Dr Keane also states that she understands that it is now legally binding that the reception building is under negative pressure in order to reduce odours.

Comment:-The RD stipulates several measures to be put in place to ensure that odour nuisances are not generated at the facility. These measures include the provision of negative air pressure and treatment of ventilated gases in any buildings processing putrescible waste (Condition 6). Collected air from the biowaste treatment facility

Comment:-See Section 12.1 (iii) above.

12.3 Submission from Dr Noreen Keane, Glenfield, Thornhill Road, Old Connaught, Bray, County Wicklow

In her second submission Dr Noreen Keane refers to an incident at the facility where partly decomposed green material was shredded at the facility and caused "a foul slurry-like smell" coming from the facility. Dr Keane states that this will ensue if all processing in the proposed biowaste facility is not done under cover until the organic matter has fully decomposed. Furthermore Dr Keane states that she assumes that the shredding of green waste shall be carried out inside the reception building.

Dr Keane points out that noise and odours both rise and are carried by the prevailing wind. Dr Keane states that monitoring the low lying northern boundaries of the facility for noise and odours is useless and invites the Agency to carry out monitoring from the higher points where she and her neighbours live.

Comment:-Condition 8 of the RD states that all processing of waste intended for composting shall be carried out inside the biowaste reception building. In addition Condition 6 of the RD requires that the reception building be operated under negative pressure with all ventilated gases being treated by biofilters including the air collected from the in-vessel units and the ASPs to minimise any potential odour nuisances.

In relation to monitoring at the northern boundary see Section 12.2 (iii) above.

12.4 Submission from Mr Brian Beckett, Fisheries Environmental Officer – Dublin District, Eastern Regional Fisheries Board, 15a Main Street, Blackrock, County Dublin

Mr Brian Beckett makes two points in his submission as outlined below:

- (i) *Mr Beckett notes that the County Brook which runs through the Fassaroe site is a salmonid system and a tributary of the River Dargle which is a designated salmonid system. Mr Beckett states preventing any polluting*

matter from entering the river must be a key component of any waste licensing process

- (ii) *Mr Beckett states that the “highly polluting nature” of the wastewater potentially generated at the facility highlights the need for implementation of comprehensive foul and surface water management measures to safeguard the ecological integrity of local surface waters. Mr Beckett states that under no circumstances should there exist the possibility of cross-contamination of the two wastewater streams, neither should there be any scope for foul water entry to the local surface water system.*

Comment:-The County Brook mentioned in this submission runs adjacent to the site and is referred to as the Glenmunder stream in this report.

The RD requires several measures be installed to prevent pollutants entering the stream. Firstly no water is directly discharged to the stream however clean stormwater are discharged to soakaways. The applicant is required to install separate drainage network systems for storm water run-off and trade/sanitary effluent from the facility to include installation of silt traps and oil interceptors with automatic shut-off valves installed (Condition 3). Condition 5 of the RD stipulates that no trade effluent, leachate and/or polluted storm water shall be discharged to surface water drains and surface water courses. Condition 3 requires the applicant to have adequate supply of spill kit material to deal with any spillages on site. Furthermore the applicant is required to carry out surface water monitoring as well as biological monitoring of the river (Schedule C).

12.5 Submission from Mr Brian Beckett, Fisheries Environmental Officer – Dublin District, Eastern Regional Fisheries Board, 15a Main Street, Blackrock, County Dublin

In his second submission Mr Beckett raises the following new issues as detailed below:

- (i) *Mr Beckett states that commitment to preservation of a 10m wide riparian corridor is potentially very important to the protection of local aquatic ecological integrity.*

Comment:-The 10m wide corridor referred to by Mr Beckett is described by the applicant in the revised Ecology Report submitted as part of the Article 16 reply received on 18/10/05. The applicant states in the report that provision has been made to maintain a buffer (approximately 10m) between the base of the restoration and the Glenmunder Stream thereby protecting the “aquatic habitat” along the stream.

- (ii) *Mr Beckett states that BAT mitigation measures should be implemented to ensure protection of the surface water system during any on-site remediation/construction programmes. Mr Beckett recommends the implementation of a SUDS system on the site. He notes that the current surface water system drains water via soakaways and a subterranean system to the stream at the lower end of the site which “arguably a high risk strategy in terms of potential Contamination from on-site materials”.*

Comment:-Several control measures, which comply with BAT, are requested to be installed at the facility to ensure that any potential contamination of the surface water stream does not occur. As detailed above this include separate drainage systems for

trade/sanitary effluent and storm water with silt traps, interceptors and automatic shut-

- (iii) *Mr Beckett states that it would be prudent to carry out daily visual check on all surface water discharges as well as carrying out quarterly analysis for a broader range of parameters.*

Comment:-Condition 3 of the RD stipulates that all storm water shall pass through a silt trap and oil separator (except storm water from roof buildings). Condition 6 of the RD requires that the drainage system, bunds, silt traps and oil separators shall be inspected weekly. Furthermore Schedule C requires that visual inspection is carried out weekly at the four surface water monitoring points (SW-1, SW-2, SW-3 and SW-4) along the Glenmunder Stream.

The parameters selected are indicators. In the event that these are triggered, a normal enforcement response is to require more extensive monitoring.

13. Charges

The current charge for the existing licence (WL 53-2) is €20,257.00 set on 3 April 2003. The recommended decision requires that the applicant shall pay an annual contribution of €15,910.00 (Condition 12). The facility is being assigned a **risk** category B but more days have been included for assessment of monitoring returns and proposals as it is a large site with many activities with some enforcement issues in relation to noise.



14. Recommendation

I recommend that a licence be granted subject to the conditions set out in the attached RD and for the reasons as drafted.

In making the recommendation for a waste licence I have taken into account all information submitted as part of the application including the Environmental Impact Statement and the submissions.

I am satisfied, on the basis of the information available, that the waste activity, or activities, licensed hereunder will comply with the requirements of Section 40(4) of the Waste Management Acts, 1996-2005.

Signed

Pernille Hermansen
Inspector
Office of Licensing & Guidance

Procedural Note

In the event that no objections are received to the Proposed Decision on the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996-2005.

Appendix 1

Attached Documentation

- Site Inspection Report (SI01DS) dated 16/2/05
- Inspector's Report (Reg. No53-2)
- Licence Audit Report (AR01OC) dated 9/2/01

Landfill Gas Monitoring Report



Landfill Site:	Bray Depot, Fassaroe, Bray, Co. Wicklow	Date of Visit:	16 th February 2005
		Time of Visit:	13:10 to 16:10
Licensee:	Greenstar Ltd	Licence Reg. No.:	53-2
Report Reference Number:	(05)SI01DS	Date of Issue of Licence:	3 rd April 2003
Monitoring By:	David Shannon	Date of Issue of Report:	07 March 2005
	Announced <input type="checkbox"/>	Unannounced	<input checked="" type="checkbox"/>

Notes On The Site Visit

Landfill Gas Monitoring

1. I introduced myself at the weighbridge office upon arrival and informed one of the staff in the office of the purpose of my visit.
2. I conducted landfill gas monitoring at six boreholes around the perimeter of the landfill (outside the fill area) and at seven boreholes constructed within or very close to the edge of the fill area. The landfill gas monitoring results are presented on page 3 of this report.
3. No methane (CH₄) was detected within the six perimeter monitoring boreholes and there was 100% compliance at these monitoring locations with the CH₄ trigger level of 1.0% v/v specified in the waste licence.
4. The carbon dioxide (CO₂) trigger level of 1.5% v/v was exceeded at five of the six perimeter monitoring boreholes and consequently, at the perimeter monitoring locations, the compliance rate with the CO₂ trigger level was just 17% v/v. (Refer to point 1 in the Actions section on page 2 of this report).
5. No methane was detected within six of the boreholes constructed within or close to the edge of the fill area. The concentration of methane recorded in the seventh borehole within or close to the fill area was 1.8% v/v. The concentration of carbon dioxide recorded within the seven boreholes constructed within or very close to the edge of the fill area ranged between 3.2% v/v and 13.7 % v/v.
6. The presence of methane in borehole GS-10 and the levels of carbon dioxide up to 13.7% v/v in the boreholes within the fill area suggest decomposition of buried biodegradable material within the landfill.
7. Seven landfill gas monitoring boreholes (GS-01, GS-07, GS-08, GS-10, GS-11, L02 & L03) were not fitted with gas sampling valves. The gas sampling valve on another monitoring borehole (BH-6) was not airtight. (Refer to point 2 in the Actions section of this report).
8. Seven monitoring boreholes (BH-5, BH-6, GS-07, GS-08, GS-10, GS-11 & L02) were not clearly labelled in-situ with their agreed sampling point names. (Refer to point 3 in the Actions section of this report).

-
9. Monitoring point **GS-09** was inaccessible. Monitoring point **L02** was poorly maintained and was completely covered by waste prior to monitoring. (Refer to point **4** in the Actions section of this report).
 - 10.1 called to reception prior to departure and advised the receptionist that Greenstar Ltd would be issued with a copy of the monitoring report.

On Site Observations

1. I observed loose litter, predominantly plastic, along the northeastern side slope of the landfill and also in the bushes behind BH-05. This creates an untidy impression and is a non-compliance with **Condition 7.1**. (Refer to point 6 in the Actions section of this report).
2. White goods were stockpiled in a haphazard fashion at the Commercial and Industrial (C & I) waste processing area. Some of the white goods appeared to be damaged and partially crushed. (Refer to point 7 in the Actions section of this report).
3. Waste tyres were stored in a skip at the C & I waste processing area. (Refer to point **8** in the Actions section of this report).

Actions To Be Carried Out By Greensfar Ltd

1. Determine the source of the CO₂ trigger level exceedences outlined in this report. If the exceedences are found to be attributable to the migration of landfill gas from the landfill, rather than external sources, then the licensee should treat this as an incident and carry out the actions specified in Condition 9.1 of the waste licence.
2. Ensure that all boreholes included in the gas monitoring programme are isolated from the atmosphere with a suitable gas sampling valve, that prevents air ingress when closed, and enables equilibration with the area to be monitored.
3. Ensure that all monitoring points within the facility are clearly labelled in-situ with their agreed sampling point name.
4. Maintain safe and permanent access to all monitoring locations and ensure that they are protected from litter and waste. Provide access to, or replace, monitoring borehole GS-09.
5. Submit copies to the Agency of the construction/lithological logs of the recently constructed boreholes. Clarify which boreholes are perimeter boreholes and which are constructed through the waste body. Maintain copies on site of the logs of all boreholes included in the environmental monitoring programme at your facility.
6. Remove all loose litter from the facility. As advised during the recent audit (ref.: AR010C) the erection of litter fencing/poles around the C & I waste processing area should be completed as soon as possible.
7. Review the waste storage procedures for Waste Electrical and Electronic Equipment (WEEE) accepted at the facility. Ensure that WEEE is handled and stored in a manner that prevents damage to the unit and, in the case of fridges, prevents the release of CFC's and/or lubricating oil. The free storage height of WEEE should not exceed 3.5m.
8. Submit details of how waste tyres accepted and/or stored at the facility are to be recovered or disposed.

Report prepared by: David Shannon **Signed:** _____
Date: _____

Address: EPA Headquarters, PO Box 3000, Johnstown Castle Estate, Co. Wexford.



LANDFILL GAS MONITORING RESULTS

Site Name (Reg. No.): Greenstar Ltd, Bray Depot (53-2)	Site Address: Fassaroe, Bray, Co Wicklow		
Licensee: Greenstar Ltd			
Site Status: Licensed 03/04/03	Date: 16/02/05	Time: 13:55 to 15:30	
Instrument used: GA2000	Date Next Full Calibration: July 2005		
Serial number: GAO5355			
Monitoring Personnel: David Shannon	Weather: Overcast & dry	Barometric pressure: 1021 hPa	
		Temperature: 9°C	

Results

Sampling Point	CH ₄ (% v/v)	CO ₂ (% v/v)	O ₂ (% v/v)	Comments
<i>The following monitoring points are reported to be perimeter boreholes constructed outside the waste body.</i>				
GS-01	0.0	5.1	10.7	CO ₂ trigger level exceeded. No gas sampling valve.
GS-02			-	Water level < 30cm below ground level. Insufficient volume of gas within the borehole to allow representative gas monitoring.
GS-05	0.0	2.7	17.4	CO ₂ trigger level exceeded.
GS-06	0.0	4.7	17.0	CO ₂ trigger level exceeded.
BH-5 ^{Note 2}	0.0	3.4	17.8	CO ₂ trigger level exceeded.
BH-6 ^{Note 2}	0.0	0.7	20.3	Gas sampling valve was not airtight.
BH-7	0.0	2.4	17.5	CO ₂ trigger level exceeded.
<i>The following monitoring points appear to have been constructed within or very close to the edge of the fill area. Landfill gas trigger levels do not apply to monitoring points within the fill area.</i>				
GS-07 ^{Note 2}	0.0	6.8	14.6	No gas sampling valve.
GS-08 ^{Note 2}	0.0	5.6	14.0	No gas sampling valve
GS-09				No access to GS-09.
GS-10 ^{Note 2}	1.8	13.7	0.0	No gas sampling valve.
GS-11 ^{Note 2}	0.0	3.2	16.9	No gas sampling valve.
L01	0.0	6.4	13.2	
L02	0.0	7.3	9.4	No gas sampling valve.
L03	0.0	11.3	8.5	No gas sampling valve.

General Comments

Note 1. Condition 6.3.1 of the waste licence states that:

The following are the trigger levels for landfill gas emissions from the facility measured in any service duct or manhole on, at or immediately adjacent to the facility and/or at any other point located outside the body of the waste:-

- a) *Methane, greater than or equal to 1.0% v/v; or*
- b) *Carbon dioxide, greater than or equal to 1.5% v/v.*

Note 2. I was advised that monitoring boreholes BH-5, BH-6, GS-07, GS-08, GS-10 and GS-11 were constructed approximately one week prior to monitoring.

INSPECTORS REPORT

WASTE LICENCE REGISTER NUMBER:	53-2
APPLICANT:	Noble Waste Disposal Limited
FACILITY:	Fassaroe. Brav. Co. Wicklow
INSPECTOR'S RECOMMENDATION:	That a revised licence be granted subject to conditions.

(1) Introduction:

This report relates to an application by Noble Waste Disposal Limited for a review of their existing waste licence (Reg. No. 53-1, granted 22/12/99). Noble Waste Disposal Ltd. is a wholly owned subsidiary of Celtic Waste Ltd. who acquired Noble Waste Disposal Ltd. in November 2000. The review application was received on 6/11/01.

The facility is currently licensed to operate a waste transfer station and an inert landfill although waste has not been deposited in the on-site landfill since 27/11/00. The activities being carried on at the facility have evolved considerably from those for which a waste licence was granted. The facility now involves the operation of a transfer station rather than a combination of a transfer station and landfill. The current licence has a significant number of conditions in relation to the landfill.

The primary reasons for a review are to increase the tonnage of waste accepted from 105,000 to 129,502 tonnes per year and to cease the activity of landfilling waste on-site (Class 1 of the Third schedule). A more detailed discussion on the reasons for a review is contained in Section 2 of this report.

The applicant has been granted planning permission (November 2002) for a proposed new transfer building (Phase I). The facility infrastructure has changed since the existing licence was issued. Further details are given in Section 3 of this report.

The nearest residential dwellings are located to the south eastern side of the facility. The nearest dwelling is 2 m away from the facility access road. The existing transfer station building is approximately 65 m from the nearest residence. Other areas where waste is processed are at least 100m away from the nearest residence.

Classes 11, 12 and 13 of the Third Schedule and Classes 2, 3, 4, 11, 12 and 13 of the Fourth Schedule were applied for in the application. Class 12 of the Third Schedule is the Principal Activity.

The environmental impacts and associated mitigation measures at this facility were addressed in detail in the Inspector's report that accompanied the PD for the existing Waste Licence Reg. No. 53-1. The monitoring requirements for this recommended PD reflect those of the existing licence, any subsequent agreements during the

enforcement of the existing licence and amendments to reflect the cessation of landfilling at the site and associated changes.

Activities recommended for licensing:

It is recommended that all the above activities, be licensed subject to the Conditions contained in the attached PD.

Quantity of waste (tpa)	129,502
Environmental Impact Statement Required	No
Number of Submissions Received	1

Facility visits:

DATE	PURPOSE	PERSONNEL	OBSERVATIONS
29/11/01	Site notice compliance and inspection.	B. Rooney	Site Notice non-compliant with Art. 8.
26/04/02	Site notice compliance and inspection	P. Hermansen B. Rooney H. Maher	Site Notice complies with Art. 8

Maps showing the outline of the facility to which the application relates and the facility layout is provided in Appendix 1.

Fit and proper person

It should be noted that Noble Waste Disposal Ltd. 53-1 was convicted on 7 charges for non compliances with their existing licence on 14/06/02 under the Waste Management Act, 1996. The charges related to an audit on 12/12/00 just one month after take over of the facility by Celtic Waste Ltd. and to a site visit and a second audit carried out in February 2001 and March 2001. The total costs to the licensee amounted to: total fines € 6,000, Agency costs € 6,379 and legal costs € 3,268. Since, the date of the conviction the applicant has endeavoured to comply with the conditions of the existing licence.

(2) Reasons for the licence review as outlined by the applicant

The reasons put forward by the licensee for this review are:

- **To increase the waste intake accepted** from 105,000 to 129,502 tonnes per annum. Condition 1 of the recommended PD allows the increased tonnage.
- **To cease landfilling at the facility**, i.e. Class 1 of the Third Schedule (WMA, 1996). The applicant ceased landfilling at the site on 27/11/00. Hence, this class of activity is excluded from the activities licensed i.e. from *Part I Activities Licensed* in the PD.
- **To use C&D waste on site for restoration**, i.e. Class 11 of the Fourth Schedule (WMA, 1996).

- **To conduct trial composting of biodegradable waste and green waste.** Conditions 1, 3 and 5 of the recommended PD allows this.
- **To undertake recovery of wood and green waste including wood chipping and storage on-site.** Conditions 1 and 5 of the recommended PD allows this.
- **To extend the hours of on-site waste storage, in enclosed containers, to a period greater than 24 hours.** Condition 7 of the recommended PD requires waste stored in enclosed containers to be removed from the site within forty eight hours of arrival on site, except at bank holidays when the waste has to be removed within seventy two hours of arrival on site.
- **To increase the number of overnight waste storage containers from 3 to 10.** Condition 7 of the recommended PD does not limit the number of containers held overnight.
- **To undertake recovery of glass, i.e. Class 4 of the Fourth Schedule (WMA, 1996)**
- **To build a new transfer building in two phases.** Schedule B: Specified Engineering Works of the PD allows for this.
- **To incorporate infrastructure developments:** The recommended PD incorporates any infrastructural developments undertaken since the existing licence was granted.
- **Amend monitoring points:** This refers to the relocation of dust monitoring points DS-01 ,DS-03 and DS4 (Condition 3).

(3) Facility Development

The installation of infrastructure at the facility is controlled by Condition 3 of the recommended PD.

The following infrastructure has been put in place since the existing licence was granted: **A** tipping ramp and waste inspection area for C&D waste and non-putrescible commercial/industrial waste, a bunded fuel storage area, a waste quarantine area, a **staff car parking area, two weighbridges, ramp and truck wash,** vehicle access road to transfer building and the concrete pad adjacent to the existing transfer building has been enclosed to house vehicle and container maintenance and waste recovery activities.

A permanent gas monitoring system has been installed in the on-site office buildings.

Since the granting of the existing licence, three groundwater/landfill gas monitoring boreholes (BH-5, BH-6 and BH-7) and two leachate boreholes (LO1 and L02) have been installed on site. Two groundwater/landfill gas monitoring have been removed due to construction works on site.

Additional infrastructure required

The applicant has been granted planning permission by Wicklow County Council for certain construction works. The works consist of a proposed new transfer building

(Phase I), truck marshalling area, road works, proposed new wastewater treatment system, trial composting area, truck parking area, trailer parking area, skip storage area, glass storage area and wood processing/storage area.

New Transfer Building (Phase I and II)

The applicant proposes that the new transfer building be built in two phases. The applicant anticipates that the transfer building (Phase I) should be complete by October 2003. Condition 3 and Schedule B requires the approval of the Agency before using the new transfer building (Phase I and II). The applicant proposes to construct phase II in the latter half of 2003 or in 2004.

Trial Composting Unit

The applicant proposes to install a trial biodegradable composting unit at the facility to compost biodegradable and green waste. The PD limits (Condition 5) the quantity of waste to be composted to 2000 tonnes of biodegradable and green waste per annum. The unit is a fully enclosed composting unit fitted with an exhaust air treatment section with a biofilter attached (dimensions 2m x 2m x 0.8m). The leachate generated by the composting process will be collected in a sump and recirculated into the composting unit to aid the composting process (Condition 3). Schedule C of the PD sets ELVs from the biodegradable composting unit. Schedule D of the recommended PD outlines the monitoring to be carried out on emissions from the biodegradable composting unit. The level of monitoring required reflects that trial composting has been applied for and agreed in this PD.

The applicant proposes installing a composting building if the trial composting is successful. The results of this trial composting may not be available for a year or so. Hence, the PD does not allow for this activity as the applicant has only supplied details on a possible location at the western boundary of the facility and has not specified when they propose installing this building or any details as to what amount of waste are to be composted.

Civic Waste Facility

The applicant proposes installing a Civic Waste Facility at the eastern side of the facility (Condition 3). The design of the Civic Waste Facility has not yet been fully determined as the applicant wishes to consult with the Local Authority before installing the facility. Condition 3 of the recommended PD requires that a proposal on the design of the civic waste facility be agreed with the Agency prior to commencement of operations at the Civic Waste Facility. The types of waste to be accepted have not yet been determined. Condition 5 of the PD requires the licensee to submit a proposal on proposed waste types to be accepted as well as the waste acceptance procedures for the civic waste facility prior to commencement of operations at the Civic Waste Facility.

Final Capping

The landfill gas monitoring results submitted by the applicant showed exceedances of gas trigger levels, indicating that historical landfilling of biodegradable waste has taken place at the facility. Hence, the PD (Condition 4) requires the applicant within four months to submit a report on the extent of capping and landfilling at the site, including recommendations for implementation of appropriate capping at the landfill based on the findings. Unless otherwise agreed with the Agency, Condition 4 of the PD stipulates the final capping system required.

Wood Chipper

The applicant has applied for a wood chipper and a wood storage area to be installed outdoors at the western boundary of the facility. Condition 5 of the recommended PD requires the applicant to assess the dust and noise emissions from the wood chipper prior to use. The licensee is required to submit a report with recommendations on the hours of operation of the unit and noise and dust control measures necessary to comply with the licence. If required, the abatement measures for noise and dust are to be implemented prior to installation of the wood chipper on site. Wood will be stored in stockpiles at the wood storage area. The PD requires the wood stored in stockpiles at the facility to be removed within two months (Condition 5).

Glass storage

The applicant has applied for the installation of a glass storage area outdoors at the western boundary, where glass accepted at site will be stored before transfer off-site for recovery. The closest residencies are located at the south eastern boundary. Condition 5 of the recommended PD allows for the storage of glass outdoors.

Wastewater treatment system

The applicant proposes to maintain two wastewater treatment systems at the site. The recommended PD requires a wastewater treatment system dedicated to the treatment of toilet and canteen wastewater and another treatment system for treatment of all vehicle wash and floor wash wastewater and contaminated surface water run-off (Condition 3).

Waste Quarantine Area

The current licence required the applicant to submit a proposal regarding installation of a waste quarantine area. The proposal was agreed by the Agency subject to the area being secured, bunded and surfaced to deal with spillages. The waste quarantine area currently drains to the septic tank and the surface area is not impervious. Condition 3 of the recommended PD requires that the waste quarantine area is installed in accordance with the aforementioned requirements.

Monitoring Boreholes

Landfill gas monitoring boreholes:

The recommended PD requires five landfill gas monitoring boreholes to be installed at the western and southern boundary of the facility where there are currently no

boreholes. The additional boreholes are required to facilitate the monitoring of landfill gas migration at the facility as the final capping is now to be installed and it is proposed that the new transfer building will be built on top of an area with historical landfilling.

Leachate monitoring boreholes:

Condition 3 of the recommended PD requires the applicant to install an additional leachate borehole within the waste body downgradient to the existing leachate boreholes to monitor leachate in this area.

Nuisance Control

Measures to control possible nuisances at the facility are specified in Condition 7

(4) Waste Types and Quantities

The recommended PD allows the facility to accept up to 129,502 tonnes of waste per annum of household waste (25,000 tonnes), commercial waste (69,500 tonnes), C&D waste (35,000 tonnes) and hazardous waste (2 tonnes) as detailed in Schedule A. The PD allows for an increase in the tonnage of construction and demolition waste to be accepted at the facility for restoration purposes at the facility provided that the total annual tonnage of waste is not exceeded. Condition 1 of the PD prohibits the acceptance of hazardous waste (except machinery batteries) and liquid waste.

It is proposed that the C&D waste accepted at the facility will be processed to produce restoration material for onsite use. Condition 5 and Schedule A of the recommended PD ensures that only inert waste that is uncontaminated and suitable for restoration of the landfill on site shall be used for restoration. The PD (Schedule A) requires the waste used for restoration on-site to comply with the waste acceptance criteria and limit values for pollutant content for inert waste listed in the *Draft Commission Decision establishing criteria and procedures for the acceptance of waste at landfills* of 1 May 2002.

The current hours at the facility as agreed with the agency are as follows:

Monday to Saturday inclusive: Waste acceptance: 7.30 – 19.00
 Operation hours: 7.30 – 21.00

The applicant has applied to have the Civic Waste Facility open from 7.30 – 21.00. The recommended PD requires the current hours to be maintained and restricts the hours of the Civic Waste Facility to the same opening hours.

(5) Restoration and Aftercare

The applicant states that all inert waste will be used for site reclamation. It is anticipated that the reclamation programme will be completed within three years. The PD requires that the landfill facility be restored within three years of the date of grant of this licence (Condition 4 of the PD). Condition 4 of the recommended PD requires the licensee to submit a restoration and aftercare plan for the facility within six months of the date of grant of licence. Noble Waste Disposal Ltd. detailed that they

may wish to process construction and demolition waste for resale, after the landfill has been restored. Condition 10 requires records to be maintained of processed C&D waste moved off-site.

Soil contamination:

The groundwater monitoring results from the borehole BWGS-04 (now removed) located adjacent to a previously unbunded oil storage area indicated oil contamination on a number of occasions. Visual inspection of the borehole also indicated oil contamination. Condition 4 of the recommended PD requires the licensee to investigate the extent of the hydrocarbon contamination and to implement remedial measures.

(6) Emissions to Air

Emissions to air from the facility include landfill gas, odours, dust and noise.

Landfill Gas

The landfill gas monitoring locations required in the PD vary from the monitoring locations applied for as one of the boreholes has been removed and replaced with a new borehole. Condition 8 and Schedule D of the Recommended PD sets out the monitoring programme for landfill gas.

There have been exceedances of trigger levels on occasions. The existing transfer building is currently not permanently monitored for gas. The PD requires that permanent gas monitoring systems are maintained and installed in all enclosed existing and proposed structures on site (Condition 3).

The trigger levels for landfill gas are set out in Condition 6 of the PD. The landfill gas concentration limit values in buildings are set out in Schedule C of the PD.

Odours

Since the date of the grant of the current licence there has been one odour complaint. Since 17/02/02 daily odour inspections have been carried out at the facility.

Weekly nuisance monitoring for odours is required under Condition 8 of the recommended PD. Condition 7 of the PD requires the licensee to ensure that odours do not give rise to nuisance at the facility or in the immediate area of the facility. Schedule D of the PD requires the operator of the biocomposting unit to carry out daily subjective odour monitoring for the first three months of operation of the trial biodegradable composting unit and thereafter as required by the Agency.

Dust

The dust monitoring carried out at the facility in 2000 and 2001 show that the dust deposition limits have been exceeded at two of the monitoring points (DS-01 and DS-04) for 3 out of 4 monitoring events.

The applicant proposes to relocate three of the monitoring points DS-01 (due to construction works), DS-03 (due to vandalism) and DS-04 (due to the current location not being representative of waste management operations). DS-04 is currently placed next to an exposed sand and gravel face. Condition 3 of the recommended PD requires these changes.

Provisions for dust control are required under Condition 7. Condition 5 prohibits the operation of the shredder at the C&D waste recovery area at wind speeds above 14 m/s (Force 7). Dust monitoring is required under Condition 8 and Schedule D. Dust emission limit values are set out in Schedule C.

Noise

Noise monitoring carried out by both the applicant and the Agency shows exceedances of the noise emission limit values at three monitoring locations (N1, N2 and N3) during the daytime on three monitoring occasions. The exceedances are attributed to vehicle movements on site.

If necessary, the applicant will be required to install noise abatement measures at the wood chipping area if the required report shows that it is needed (see Section 2). The processing of C&D waste and non-putrescible commercial/industrial waste is required to be moved indoors when the proposed new transfer building (Phase II) has been constructed (Condition 5 of the PD).

Noise monitoring is required under Condition 8 and Schedule D of the recommended PD. Noise emission limits to be measured at any noise sensitive locations are set under Schedule C. Condition 6 requires that there shall be no clearly audible tonal component or impulsive component in the noise emissions from the activity at the noise sensitive locations.

(7) Emissions to Groundwater

The Inspector's Report that accompanied the existing waste licence 53-1 outlines the geology and hydrogeology of the facility.

The groundwater monitoring boreholes required in the PD vary from the monitoring boreholes applied for as some of the groundwater boreholes have been removed and replaced at the facility. Groundwater monitoring is required by Condition 8 and Schedule D of the recommended PD. Condition 6 of the PD requires that there is no direct emission of groundwater.

Leachate

Leachate monitoring is required by Condition 8 and Schedule D. The applicant is required to carry out leachate analysis once off and thereafter as required by the Agency. The leachate has not been analysed under the current licence due to low levels of leachate in the wells.

(8) Emissions to Waters

It is proposed that there will be two wastewater treatment systems to treat wastewater and contaminated surface water run-off.

The PD (Condition 3) requires the following:

- 1) An existing wastewater treatment system with a new percolation area to treat toilet and canteen wastewater.
- 2) A proposed new wastewater treatment system to treat vehicle wash and floor wash wastewater and contaminated surface water run-off. The new treatment system is designed to handle a daily flow of 20 m³.

Results from the groundwater monitoring borehole (BH-05) downgradient of the existing septic tank indicates contamination from the existing septic tank. As detailed above the PD requires a new percolation area to be installed.

Emission to Surface Waters

There is no direct emission of surface water from the facility. The site is close to the Glenmunder stream which drains to a designated salmonid river, the Dargle River. Condition 6 ensures that there is no discharge of contaminated surface water, wastewater or leachate into the Glenmunder River.

Surface water monitoring results from the Glenmunder River submitted by the applicant indicates possible contamination from the landfill site with elevated ammoniacal nitrogen and suspended solids at downstream monitoring locations. The ammoniacal nitrogen values have slightly exceeded salmonid standards on two occasions over the last two years. Surface water monitoring is required by Condition 8 with the parameters, frequencies and locations outlined in Schedule D.

The PD requires that biological assessment of the river be carried out until the landfill has been restored (Condition 8).

Condition 3 of the PD ensures that effective surface water management is provided and maintained at the facility.

(9) Other Significant Environmental Impacts of the Development

The applicant states that landfilling has been carried out at the site since 1947. In December 1999 the facility was granted a licence for the operation of a transfer station and an inert landfill. Landfilling ceased in November 2000. Prior to 1995 no records were kept of the waste disposed at the site. The landfill gas monitoring results indicate that some biodegradable waste has been landfilled at the site.

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

1. The County Wicklow Waste Management Plan 2000 – 2004 (adopted April 2000) states that recovery activities in County Wicklow are mainly carried out by Noble Waste Disposal Limited.

2. There is no Air Quality Management Plan for County Wicklow.
3. There is no Water Quality Management Plan for County Wicklow

(11) Submissions

One valid submission was made in relation to this application as set out below.

1. Catherine Buchanan, Site Protection, Duchas, 7 Ely Place, Dublin 2.

The letter states that they have no objections to the granting of this licence.

Signed _____

Dated:

Name Pernille Hermansen

'APPENDIX1

LOCATION PLAN

Refer to Waste Admin Office files for location of the following maps:

1. Ownership Plan, Figure B. 1.0
2. Civil Existing Operations Layout, Drawing No. B7498-C0101-B
3. Civil Site Layout Plan with Drainage, Drawing No. B7498-C012-C

Licence Audit Report

Mr Micheal Geary
Greenstar Limited
Bray Depot,
Fassaroe,
Bray,
Co Wicklow.

Lead Auditor:	Olivia Cunningham	Licence Register No:	53-2
Inspector:	Breege Rooney	Audit Reference No:	(Reg. No 53-2)AR01OC
Audit Criteria:	Licence Reg. No. 53-2	Scheduled:	28/10/2004
Audit No:	1	Date of Audit:	05/11/2004
Date of Issue of Audit Report:	09/02/2005		

F.A.O. Mr. Micheal Geary

This Licence Audit Report details the Agency's findings following an audit at your facility on the above date.

NOTIFICATION OF NON-COMPLIANCE

You have been found to be in non-compliance with the conditions of the Licence as set out in this Audit Report. You are required to undertake the corrective actions specified to close out the Non-Compliances and Observations raised in this Report or further enforcement action may be taken by the Agency.

In view of the above you are required to submit a schedule to the Agency within **14 working days** of receipt of this Report detailing how the non-compliances and observations specified therein are to be rectified. Please quote the above Audit Reference Number in any future correspondence in relation to this Report. If you have any further queries please contact Ms. Breege Rooney at **053 60600**.

1. OPENING MEETING

The opening meeting commenced at 11:30 and the following were in attendance:

Representing Greenstar Limited

David Lawlor	General Manager
Fiona Farrell	Environmental Executive
James Brady	Operations Manager

Representing the Environmental Protection Agency:

Olivia Cunningham	Lead Auditor
Ms Breege Rooney	Inspector

Olivia Cunningham gave a brief introduction *to* the objectives and scope of the audit and the procedure to be followed for the remainder of the audit.

2. ON-SITE ASSESSMENT

2.1 Review of Progress of EMP Implementation

A presentation on the progress of implementation of the Environmental Management Programme was given by Fiona Farrell.

The licensee outlined that progress had been made in relation to the following: increased recycling rates and improved infrastructure on-site. Environmental awareness and training remains outstanding for 2004.

2.2 Site Inspection and Assessment

A tour of the site was conducted, special attention was paid to the transfer building, the dry recyclable picking line, the commercial and Industrial (C&I) processing area, the construction and demolition (C&D) processing area, the wood chipping area, the quarantine area, the newly constructed phase I building, waste storage area and monitoring boreholes.

2.3 Interview

The following representatives were interviewed during the audit:

Name	Position	Issue
David Lawlor	General Manager	General Site Issues
Fiona Farrell	Environmental Executive	General Site Issues
James Brady	Operations Manager	General Site Issues
John Fox	Supervisor	Odour Control System
Gerry Vickens	Mechanic	Waste Oil
Craig Gray	Supervisor	Food Waste
Tomas Politika	Driver	Skip of Waste
Bobby Green	Administration	Waste Profiling

2.4- Documentation

The following documentation was requested for review:

Record	Condition No.	Comment
Waste Records	10.2	See Audit Findings
Environmental Management System	2.3.1	Available
Training Records	2.3.2.4	See Audit Findings
Complaints	10.4	Available

3. GENERAL COMMENT

A number of significant non-compliances were noted during the audit, particularly in relation to the acceptance of putrescible waste outdoors at the C & I processing area. As a result of this the licensee is advised to urgently amend waste acceptance procedures to ensure that only those waste types specified in the licence are accepted on-site at the locations specified in the licence. The Agency wishes to remind the licensee of the requirements of condition 5.1.1 to ensure that all processing of C & D and C & I waste is carried out indoors by 03/04/2005. The Agency notes and encourages the increased recycling rates at the facility.

4. CLOSING MEETING

The closing meeting commenced at 16:32 and the attendees were as at the opening meeting, with the exception of Michael Geary (Greenstar Limited) who was present for the closing meeting.

Olivia Cunningham gave a summary of the audit result. The licensee was found to be in non-compliance with the Licence in the area listed below. Non compliances and observations made during the audit (listed below), were discussed.

The licensee was briefed on the Agency's reporting procedures and was advised that an audit report would be issued.

Finally, the licensee was thanked for the courteous and co-operative manner of the staff, and the assistance and co-operation extended during the audit.

5. AUDIT FINDINGS

5.1 Audit Non-Compliances

The audit process is a random sample on a particular day of a facility's compliance with some of its licence conditions. Where a non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence.

The licensee was found to be in non-compliance with the requirements of the licence in respect of the following on the day of the audit (Schedule and Condition numbers refer to the Licence):

1. Landfill Gas Monitoring Borehole

The fifth new landfill gas monitoring borehole (GS10) had not been installed. This was due to be installed by 03/07/2003.

This is a repeated non-compliance with Condition 3.17.1.1 which states:

Within three months of the date of grant of this licence, the licensee shall install five additional landfill gas monitoring boreholes located at the western and southern perimeter boundary of the facility, at locations to be agreed with the Agency.

Corrective Action Required

The Agency notes that the licensee is in discussion with a contractor (Atkins) to install the borehole. This borehole needs to be installed as a matter of priority.

2. Processing Areas

All C&I and C&D processing should be carried out on impermeable hardstand. The C&D processing

is not carried out on hardstand and the C&I processing is only partially carried out on hardstand.

This is a non-compliance with Conditions 3.5.2 and 3.14

Condition 3.5.2 states:

All waste processing/storage areas, the truck washing area and the fuel storage area shall be impermeable hardstand. In addition, the floor of the buildings and hardstanding areas at the facility shall be concreted and constructed to British Standard 8110.

Condition 3.14 states:

Construction and Demolition Waste Recovery Area.

3.14.1 The construction and demolition waste recovery area shall be as specified in Drawing No. B7498-CO10-B Civil Existing Operations Layout, unless otherwise agreed with the Agency.

3.14.2 This infrastructure shall at a minimum comprise the following:-

- a) An impermeable concrete slab.*
- b) Collection and disposal infrastructure for all run-off:*
- c) All stockpiles shall be adequately contained to minimise dust generation.*
- d) Within two months of the date of grant of this licence, the licensee shall review the measures in place to minimise dust generation at this facility and shall provide a report to the Agency for its agreement, making recommendations on the necessity of installing a sprinkling irrigation system for the control of dust nuisance from the facility. Any remedial works recommended in this report must be implemented within a time-scale to be agreed with the Agency.*

Corrective Action Required

Ensure that all C&I and C&D processing is carried out on impermeable hardstand

3. Permanent Gas Monitors

Permanent gas monitors have not been installed in **all** the offices on-site. It should be noted that trigger levels for CO₂ on-site have been breached on a number of occasions.

Condition 3.17.1.3 states:

Within three months of the date of grant of this licence or at the time of construction, an effective permanent gas monitoring system shall be installed and maintained in all the existing and proposed enclosed structures on site

Corrective Action Required

Given the number of buildings on-site and the potential risks involved it is important to install and commission the permanent gas monitors as soon as possible.

4. Recyclable Waste Storage

Significant quantities of recyclable material (including contaminated fines containing soil, stones and

small amounts of plastic waste, and C&D fines) have been stored on-site for periods greater than two months. This has not been agreed by the Agency.

Condition 5.3.2.1 states:

Recyclable waste shall not be stored in stockpiles for periods greater than two months unless agreed in advance by the Agency.

Corrective Action Required

Ensure that recyclable waste is not stored on-site for periods greater than those agreed by the Agency. It should be noted that an extension to the two month time period may be granted subject to prior approval with the Agency. Any proposal to extend this time frame should include details of additional nuisance controls etc.

5. Waste Acceptance

Putrescible waste (including food waste) waste was observed in black refuse sacks in a number of locations in the C&I processing area.

Condition 5.1 states:

All waste processing shall be carried out inside either the existing or the proposed waste transfer buildings, excluding (i) the trial composting of biodegradable waste and green waste, (ii) wood chipping and (iii) processing of C&D waste and non-putrescible commercial/industrial waste.

Corrective Action Required

Review waste acceptance procedures, particularly in relation to the acceptance of skips containing black plastic bags. As a minimum spot checks must be carried out on skips containing black refuse sacks to ensure that putrescible waste is not processed outdoors.

6. Wheelwash

A wheelwash has not been installed at the facility.

Condition 3.8.1 states:

The licensee shall provide and maintain two weighbridges and a wheelwash at the facility.

Corrective Action Required

Given the lack of hardstanding at the facility, the wheelwash should be installed as a matter of priority.

7. Non-notification of Incident

During the audit the audit team were informed that the biocycle wastewater treatment system has been malfunctioning since early September. Effluent from this system is being tankered off-site. This incident was not notified to the Agency.

Condition 1.7, 9.1 and 11.2 states:

1.7 The following shall constitute an incident for the purposes of this licence:

- a) An emergency.
- b) Any emission which does not comply with the requirements of this licence.
- c) Any exceedance of the daily duty capacity of the waste handling equipment.
- d) Any trigger level specified in this licence which is attained or exceeded.
- e) Any indication that environmental pollution has, or may have, taken place.

9.1 In the event of an incident the licensee shall immediately:

- a) Identify the date, time and place of the incident.
- b) Carry out an immediate investigation to identify the nature, source and cause of the incident and any emission arising therefrom.
- c) Isolate the source of any such emission.
- d) Evaluate the environmental pollution, if any, caused by the incident.
- e) Identify and execute measures to minimise the emissions/malfunction and the effects thereof.
- f) provide a proposal to the Agency for its agreement within one month of the incident occurring to:
 - i) identify and put in place measures to avoid reoccurrence of the incident;
and
 - ii) Identify and put in place any other appropriate remedial action.

11.2 In the event of an incident occurring on the facility, the licensee shall:

- a) Notify the Agency as soon as practicable and in any case not later than 10.00 a.m. the following working day after the occurrence of any incident.
- b) Submit a written record of the incident, including all aspects described in Condition 9.1(a-e), to the Agency as soon as practicable and in any case within five working days after the occurrence of any incident.
- c) In the event of any incident which relates to discharges to surface water, which affects the interests of the local authority the licensee shall notify the Eastern Regional Fisheries Board and/or Wicklow County Council as soon as practicable and in any case not later than 10.00 a.m. on the following working day after such an incident.
- d) Should any further actions be taken as a result of an incident occurring, the licensee shall forward a written report of those actions to the Agency as soon as practicable and no later than ten days after the initiation of those actions.

Corrective Action Required

Carry out repairs on the system, and provide an independent report on whether the system in place is adequate to treat the effluent generated on-site. Submit an incident report to the Agency detailing any corrective actions taken. All future incidents should be reported to the Agency as per Conditions

above.

8. Public Access

Members of the general public were observed bringing waste in trailers to the C&I processing area. This is specifically prohibited under Condition 5.2.5.

Condition 5.2.5 states:

*Other than waste accepted at the civic waste facility, waste shall only be accepted **from** known customers or new customers subject to initial waste profiling and waste characterisation off-site. The written records of this off-site waste profiling and characterisation shall be retained by the licensee for all active customers and for a two year period following termination of licensee/customer agreements. There shall be no casual public access to the facility*

Corrective Action Required

Immediately cease accepting waste from members of the public at the C&I processing area.

9. Monitoring Boreholes

The quarterly monitoring report for July, August and September 2004 stated that the following boreholes were inaccessible or damaged:

- BH5 and GS 07- damaged
- L03- inaccessible (the borehole was accessible during the inspection, however, it appeared to be damaged)
- L02- inaccessible

Conditions 5.8.2 and 8.4 state:

The licensee shall maintain all sampling and monitoring points, and clearly label and name all sampling and monitoring locations, so that they may be used for representative sampling and monitoring

The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and to off-site points as required by the Agency.

Corrective Action Required

Protect all monitoring points and maintain them so that representative monitoring can be carried out.

5.2 Audit Observations

While these observations **do** not constitute non-compliances with any condition of the licence, they should be addressed or where relevant noted by the licensee in order to ensure compliance, improve environmental performance of the facility and provide clarification on certain issues where requested back to the Agency.

1. Drainage Arrangements

The staff on-site at the time of the site tour could not clarify the drainage arrangements on-site, i.e. the location of silt traps, oil interceptors etc.

Corrective Action Required

Clarify the drainage arrangements on-site and compare the current arrangements to those specified in Condition 3.11. Provide site drainage maps as necessary and ensure that all environmental staff are familiar with the drainage arrangements on-site.

2. Staff Training and Awareness.

During the course of the inspection, it became apparent that facility personnel were not completely aware of the exact environmental controls on-site. i.e. the location of silt traps, oil interceptors and gas valves. It is imperative that the facility manager and deputy manager are fully aware of all environmental controls on-site to ensure compliance with all the conditions of the waste licence. It was also noted that no-environmental training had occurred from January- October 2004.

Corrective Action Required

It is recommended that a gap analysis on training needs is carried out focusing on the requirements of the waste licence. Following this, develop a training programme for relevant personnel in accordance with Condition 2.3.2.4 of the waste licence.

Ensure that the facility manager and deputy manager complete the FAS Waste Management Course as soon as possible in accordance with Condition 2.1.2. Inform the Agency when this training has been carried out.

3. Bunding

It was noted that IBC's of detergent were unbunded.

Corrective Action Required

Provide a mobile bund for the detergent IBC's in accordance with Condition 3.10.2.

Ensure that there is adequate bund capacity in the maintenance workshop for oil drums, grease drums etc.

Ensure that all bunds are tested on a 3 yearly basis.

4. Specified Engineering Works

The audit team were informed during the course of the audit that the licensee plans to further extend the buildings on site and to install a civic amenity area.

Corrective Action Required

The licensee is reminded of the requirement to submit all SEW's to the Agency for agreement at least two months prior to the commencement of the proposed works on-site, in accordance with Condition 3.2.1 of the waste licence.

5. Litter Fencing

Litter fencing is not in place around the entire C & I processing area.

Corrective Action Required

Complete the erection of the litter fencing poles around the C & I processing area as soon as possible.

6. AER 2003

On initial inspection of the data submitted in the AER for 2003/2004 a number of discrepancies were noted. e.g. waste incoming and departing did not balance.

Corrective Action Required

For all future AER's ensure that the data for all waste quantities incoming and departing the facility are accurate and balanced. If the incoming and outgoing figures do not tally, provide an explanation, i.e. certain waste types pulled out of the C & I or C & D.

7. Waste Profiling and Characterisation

It was noted that waste is being accepted at the facility from Seamus Kelly & Sons; records obtained on-site indicate that approximately 5 tonnes of waste was accepted at the site from Seamus Kelly & Sons up to 05/11/2004.

Corrective Action Required

For reoccurring customers, the waste profiling and characterisation procedure must include an examination of the customers regulatory background, i.e. Does the customer hold a waste collection permit? Is the waste coming from an authorised transfer station? Waste from unauthorised facilities or carriers must not be accepted on-site. Please provide details on proposed actions in relation to the acceptance of waste from the Seamus Kelly facility.

8. Quantity of Waste Stored On-Site

A large quantity of waste was observed on-site.

Corrective Action Required

Submit a report estimating the quantity of waste on-site, including specifics such as, the estimated quantity of each waste type (i.e. stones, fines, timber etc.); an estimation of how long each waste type has been on-site; the intended use of the waste (i.e. foundations, capping etc.).

9. Internal Haul Roads

It was noted that the haul road adjacent to Phase I building was quite muddy.

Corrective Action Required

Improve this area by placing suitable C & D materials along this area.

6. FOLLOW-UP ACTIONS

The licensee shall take the actions required to close out the non-compliances and observations raised in this Licence Audit Report. These actions will be verified during subsequent site inspections/audits.

Please quote the Audit Reference Number in any future correspondence in relation to this Report.

Report prepared by:

Reviewed by:

Olivia Cunningham

Brendan Wall

Date:

09/02/2005

Date:
