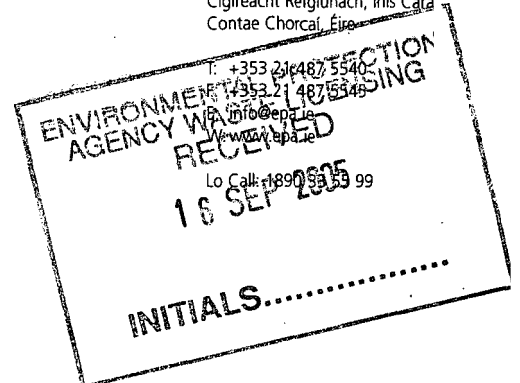


Mr J.G. O'Sullivan
Senior Executive Engineer, Environment
Kerry County Council
Áras an Chontae
Rathass
Tralee
County Kerry

Regional inspectorate, Inniscarra
County Cork, Ireland
Cigireacht Réigiúnach, Inis Cara
Contae Chorcaí, Éire



13 September 2005

Reg No: 217-1

Dear Mr O'Sullivan

I am to advise you that the Agency has received an application for a Waste Licence from Killarney Waste Disposal Limited, for a facility located at Killarney Waste Disposal Limited, Aughacurreen, Killarney.

The applicant proposes, as part of this application, to provide for the discharge of process effluent to a sewer, which the applicant has stated is vested in, or controlled by, your Council. Process effluent includes trade effluent or other matter (other than domestic sewage or storm water). I enclose copy extracts from the application form, which detail proposed discharges.

The provisions of Section 52 of the Waste Management Acts, 1996 to 2003, provides that the Agency shall obtain the consent of the sanitary authority to the proposed discharge from an activity which involves the discharge of trade effluent or other matter (other than domestic sewage or storm water), to a sewer vested in or controlled by a sanitary authority.

In order to expedite the Agency's consideration of *this* waste licence application, I am to request your authority's consent to the proposed discharge/s. It should be noted that, your authority's consent may be subject to such conditions as your authority considers appropriate as provided for in Section 52 of the Waste Management Acts, 1996 to 2003 and Section 99E (3) of the Environmental Protection Agency Acts, 1992 and 2003. Your attention is drawn to paragraphs (3) and (4) of the attached copy of the relevant section of the Act. For your convenience please find attached a reply form including a list of draft conditions compiled by the Agency.



In accordance with paragraph (2) of this section of the Act, you are requested to forward your response within 5 weeks of the date of this letter. Please note that any decision given after the expiry period shall be invalid and in those circumstances the Agency may proceed to determine the application concerned as if consent was obtained. Ann Marie Donlon is dealing with this matter and can be contacted at the Licensing Unit, Office of Licensing & Guidance, Cork Regional Inspectorate (Tel. No. 021 4875540) if you have any queries.

Your co-operation in this matter is appreciated.

Yours sincerely



Sonja Smith

Programme Officer

Licensing Unit

Office of Licensing & Guidance

Section 99E (3) & (4) of the Environmental Protection Agency Acts, 1992 and 2003

(3) Subject to subsection (4), a consent under subsection (1) may be granted subject to or without conditions and if it is granted subject to conditions the Agency shall include in the licence or revised licence concerned conditions corresponding to them or, as the Agency may think appropriate, conditions more strict than them.

(4) The conditions that may be attached to a consent by a sanitary authority under this section are the following and no other conditions, namely conditions-

(a) relating to-

(i) the nature, composition, temperature, volume, level, rate, and location of the discharge concerned and the period during which the discharge may, or may not, be made,

(ii) the provision, operation, maintenance and supervision of meters, gauges, manholes, inspection chambers and other apparatus and other means for monitoring the nature, extent and effect of emissions,

(iii) the taking and analysis of samples, the keeping of records and furnishing of information to the sanitary authority,

(b) providing for the payment by the licensee to the sanitary authority concerned of such amount or amounts as may be determined by the sanitary authority having regard to the expenditure incurred or to be incurred by it in monitoring, treating and disposing of discharges of trade effluent, sewage effluent and other matter to sewers in its functional area or a specified part of its functional area,

(c) specifying a date not later than which any conditions attached under this section shall be complied with,

(d) relating to, providing for or specifying such other matter as may be prescribed.

SANITARY AUTHORITY RESPONSE
re: SECTION 52 OF THE WASTE MANAGEMENT ACTS, 1996 to 2003

Name & Address of Sanitary Authority: Kerry County Council, Áras an Chontae, Rathass, Tralee, County Kerry.

Waste Reg. No. 217-1

Waste Facility: Killarney Waste Disposal Limited, Aughacurreen, Killarney, ,

Waste Licence Applicant: Killarney Waste Disposal Limited

Consent: Indicate Yes to one of the following statements:

| | |
|--|--|
| Consent granted subject to the consent conditions outlined below | |
| Consent granted without conditions | |
| Consent refused ^{Note 1} | |

| GENERAL CONSENT CONDITIONS | Condition to be included (Yes/No) |
|---|--------------------------------------|
| 1. No specified emission from the installation shall exceed the emission limit value set out in <i>Schedule B: Emissions Limits to Sewer</i> . There shall be no other emission to sewer of environmental significance. | |
| 2. The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as out in <i>Schedule C</i> . | |
| 3. Monitoring and analytical equipment shall be operated and maintained as necessary so that monitoring accurately reflects the discharge or emission. | |
| 4. The licensee shall permit authorised persons of the Agency and the Sanitary Authority to inspect, examine and test, at all reasonable times, any works and apparatus installed, in connection with the process effluent, and to take samples of the process effluent. | |
| 5. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activity is being carried on unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternative sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency. | |
| 6. The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence. | |
| 7. 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. | |
| 8. The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing which is or may be liable to set or congeal at average sewer temperature or is capable of giving off any inflammable or explosive gas or any acid, alkali or other substance in sufficient concentration to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer. | |
| 9. In the event of any incident which relates to discharges to sewer, having taken place, the licensee shall notify the Agency, Local Authority and Sanitary Authority as soon as practicable after the incident. | |

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Waste Licence application Register No. **217-1**

Emission Point Reference No: _____

| Parameter <i>(delete parameters which are not applicable)</i> | Monitoring Frequency <i>(e.g. monthly, quarterly, annually)</i> | Sampling Type <i>(grab, composite)</i> |
|--|--|---|
| Flow to sewer | | |
| Temperature | | |
| pH | | |
| BOD | | |
| COD | | |
| Suspended Solids | | |
| ADDITIONAL PARAMETERS <i>(if required)</i> | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

| SANITARY AUTHORITY CHARGES | |
|---|----|
| Charge per litre per metre of process effluent (as per the Waste Management Acts, 1996 to 2003) | 52 |
| Payment Frequency | |
| Annual Monitoring | |

Signed on behalf of Kerry County Council

Date _____

B.4 Sanitary Authority

In the case of a discharge of any trade effluent or other matter (other than domestic sewage or storm water) to a sewer of a sanitary authority or other body, give the name of the sanitary authority in which the sewer is vested or by which it is controlled and the waste water treatment plant (if any) to which the sewer discharges.

Name: Killarney WWTP

Address: Ross Rd.

Killarney,

Co. Kerry.

Kerry County Council

Tel: (064) 3 1046

Fax: (064) 35 164

The applicant must enclose, as **Attachment B.4**, a copy of any effluent discharge licence and/or agreement between the applicant and the body with responsibility for the sewer.

B.5 Other Authorities

The applicant should tick the appropriate box below to identify whether the activity is located within the Shannon Free Airport Development Company (SFADCo.) area.

| | | |
|----------------------------|------------------------------|--|
| Within SFADCo. Area | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
|----------------------------|------------------------------|--|

The applicant should indicate the **Health Board Region** where the activity is or will be located.

Name: Southern Health Board

Address: Wilton Rd,

Cork.

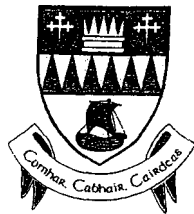
Tel: 0214545011

Fax:

B.6 Notices and Advertisements

Articles 6 and 7 of the Waste Management (Licensing) Regulations 2004 requires all applicants to advertise the application in a newspaper and by way of a site notice. See *Guidance Note*.

Attachment B.6 should contain a copy of the site notice and a drawing showing its location on site. **The original application must include the complete newspaper in which the advertisement was placed.** The relevant page of the newspaper containing the advertisement should be included with the original and three copies of the application.



03/06/2005

Sean Murphy,
Killarney Waste Disposal,
Aughacurreen,
Killarney.

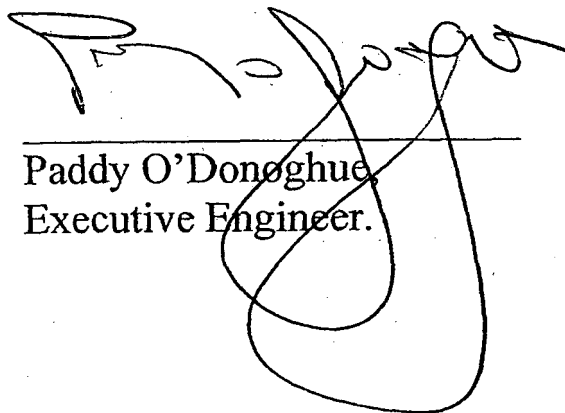
**Re: Disposal of Leachett Run-Off from your Packing Plant
to Killarney Sewerage Treatment Plant.**

Dear Sir,

I refer to your query concerning acceptance of Leachett Run-Off from your packing plant at Aughacurreen, Killarney to be disposed & treated at Killarney Waste Water Treatment Plant, Ross Road, Killarney.

The Council have no objecting in receiving run-off leachett from your packing plant at Waste Water Treatment Plant, Ross Road, Killarney subject to the appropriate fee being paid **per** cub. meter delivered.

Yours Sincerely,



Paddy O'Donoghue
Executive Engineer.

TABLE E.3(i): EMISSIONS TO SEWER(One page for each emission)

Emission Point:

| | |
|--------------------------------------|--|
| Emission Point Ref. N ^o : | Effluent Holding Tank in centre of Materials Recovery Building |
| Location of connection to sewer : | N/A Tankered to WWTP |
| Grid Ref. (10 digit, 5E,5N): | 936387E 939029N |
| Name of sewage undertaker: | Kerry County Council |

| | | | |
|-------------------|----------------------|-------------|-----------------------|
| | | | |
| Normal/day | 0.564 m ³ | Maximum/day | 0.6768 m ³ |
| Maximum rate/hour | 0.282m ³ | | |

| | |
|---------------------------|-------------------------------------|
| Periods of Emission (avg) | _____min/hr _____hr/day _____day/yr |
|---------------------------|-------------------------------------|



OUR REF: RP 2005 KILLARNEY WASTE DISPOSAL 02

PAGE 1/

ANALYSIS REPORT

| | | | |
|-----------------|---|----------------|--------------------------|
| CUSTOMER: | KILLARNEY WASTE DISPOSAL | SAMPLE TYPE: | EFFLUENT |
| ADDRESS: | Aughacureen, Killarney, County Kerry | DATE SAMPLED: | |
| REPORT TO: | Geraldine | DATE RECEIVED: | 20 July 2005 |
| ORDER NO: | N/A | DATE ANALYSED: | 20 July - 10 August 2005 |
| SAMPLING POINT: | | DATE REPORTED: | 11 August 2005 |
| | | WORK NO.: | 14020 C |

TABLE OF RESULTS

| PARAMETER | LAB REF: YOUR REF: | C05-Jul 188 Killarney Waste Disposal |
|--|-----------------------|---|
| pH | | 6.0 |
| BOD, mg/L | | >246,743.6 |
| COD, mg/L | | 360,000.0 |
| Ammonia, mg/L NH ₄ ⁺ | | 35.2 |
| Total Suspended Solids, mg/L | | 32,350 |
| Total Phosphorus, mg/L P | | 36 |
| Total Nitrogen, mg/L | | 135 |
| Arsenic, mg/L | | 0.17 |
| Cyanide, mg/L | | <0.1 |
| Fluoride, mg/L | | <1.0 |
| Chromium, mg/kg fresh weight | | 0.11 |
| Copper, mg/kg fresh weight | | 0.50 |
| Lead, mg/kg fresh weight | | <1.0 |
| Nickel, mg/kg fresh weight | | 0.48 |
| Zinc, mg/kg fresh weight | | 3.23 |

Tuulia Inkinen
 Tuulia Inkinen
 Chemistry Laboratory

- * The results relate only to the items tested.
- * The analysis report shall not be reproduced except in full without written approval of the laboratory.

dunrinc | county Kerry | Ireland | telephone +353 (0)64 33922 | fax +353 (0)64 39022
 web site www.southernscientificireland.com | e-mail info@southernscientificireland.com

registered in Ireland no 323196 | vat reg no IE 6343196 M

2. PROPOSED DEVELOPMENT

Killarney Waste Disposal propose to apply for an increase in the allowable waste intake of 40,000 tonnes per annum as shown in Table 2.1. The existing operations will remain the same as outlined in Section 1.3.1,

Table 2.1 Proposed Types/Quantities of Waste to be Accepted at KWD

| Waste Type | Maximum Tonnes per Annum |
|---|--------------------------|
| Mixed municipal waste | 15,000 |
| Organic waste (kitchen and canteen waste) | 2,400 |
| Dry recyclable wastes | 5,600 |
| Construction and Demolition waste | 17,000 |
| Total Waste | 40,000 |

Drawing No. 02-034-J4-MCOS2 Proposed Site Layout Plan and Drawing No. DG0002-01 provides details on a layout for the extension to the MRF building on site. It should be noted that the proposed layout is indicative and may change depending on machinery sizes and operational techniques.

The new building has been designed with a maximum number of access points to facilitate delivery and loading of waste to and from the building. There are 5 no. entrances to the new building. It is proposed to build an on-site access road around the perimeter of this building. The extension will be provided on the existing site which is 2.2 hectares in size. The existing Material Recovery Facility will be extended by 2,503 sq.m to a total size of 3,223 sq.m and will not exceed the existing structure's height (ridgeline is 9.45m above foundation ground level). A stream which is located on site has already been diverted.

A designated quarantine area has been identified and any consignment will be removed to the quarantine area for further inspection and if non-compliant will be returned to the customer.

The processing of the mixed municipal waste produces an effluent. The existing processing shed drains to a holding tank of 4.55m³ capacity. Approx. 6.8m³ of effluent is produced per month based on outgoing weighbridge dockets from facility. The effluent is stored in the holding tank and transported to Killarney WWTP for treatment. The new processing building will have a similar effluent collection system.

A stormwater treatment system is proposed on site. An interceptor for oil and solids separation is currently in operation on site and it is proposed to direct stormwater runoff from the interceptor to a lagoon and then to a reed bed which will discharge the treated stormwater to a percolation area. Drawing No. 02-034-J4-MCOS2 Proposed Site Layout Plan provides details on the layout of the stormwater treatment system.

A septic tank is in use on site and a Puraflo system is proposed, which will be designed to cater for 12 people at 180 litres per person per day. This equates to a discharge quantity of 2.16 cubic metres per day to be treated by the system. Roof water runoff from the proposed shed will drain to the stream as shown on Drawing No. 02-034-J4-MCOS2 Proposed Site Layout Plan.

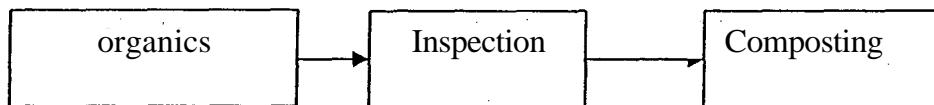
WASTE Application Form

conveyor belt which feeds the material into the baler which produces bales. Other waste types (metals, glass) are placed in storage skips. The waste is then transported off-site to licenced recovery facilities.



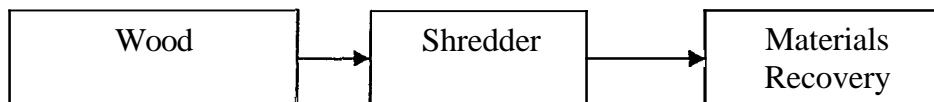
Municipal Waste Source Separated Organics (U03)

Organics that are delivered to the facility will be loaded into a container and sent to a composting plant for recovery.



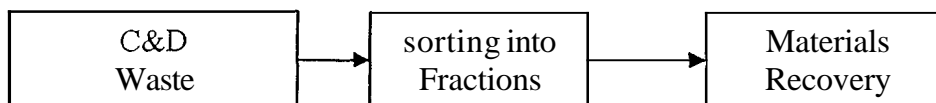
Municipal Waste Source Separated Wood (U04)

Wood is stored in the storage area in a designated bay until a viable quantity has accumulated. Then it is put **through** the shredder which is currently located outside the existing processing building. The shredded wood is then transported to a recovery facility.



Construction & Demolition Waste (U05)

C&D waste is tipped on the floor of the processing building where it is inspected and manually sorted into various fractions like metal, wood, plastic and rubble etc. Storage bays are located within the processing building which stores the waste until sufficient volumes can be transported to a materials recovery facility for C&D.



Emissions:

The processing of the mixed municipal waste produces an effluent. The existing processing **shed** drains to a holding tank of 4.55m³ capacity. Approx. 6.8m³ of effluent is produced per month based on outgoing weighbridge docket **from** facility. The effluent is stored in the holding tank and transported to Killarney WWTP for treatment. The new processing building will have a similar effluent collection system.

SECTION F CONTROL & MONITORING

F.1: Treatment, Abatement and Control Systems

Describe the proposed technology and other techniques for preventing or, where this is not possible, reducing emissions from the installation/facility. Details of treatment/abatement systems (air and effluent emissions) should be included, together with schematics as appropriate.

For each Emission Point identified complete Table F.1 of the Annex, and include detailed descriptions and schematics of all abatement systems.

Attachment F.1 should contain any supporting information.

Attachment F.1

Stormwater Runoff

A stormwater treatment system is proposed on site. An interceptor for oil and solids separation is currently in operation on site and it is proposed to direct stormwater runoff from the interceptor to a lagoon and then to a reed bed which will discharge the treated stormwater to a percolation area. The Proposed Site Plan and Drawing No. DG0002-01 provides details on the layout of the stormwater treatment system. Attachment D.1k provides more details on design of the system.

Sewage Treatment

A septic tank is in use on site and a Puraflo system is proposed, which will be designed to cater for 12 people at 180 litres per person per day. This equates to a discharge quantity of 2.16 cubic metres per day to be treated by the system.

Effluent from processing

The processing of the mixed municipal waste produces an effluent. The existing processing shed drains to a holding tank of 4.55m³ capacity. Approx. 6.8m³ of effluent is produced per month based on outgoing weighbridge dockets from facility. The effluent is stored in the holding tank and transported to Killarney WWTP for treatment. The new processing building will have a similar effluent collection system.

F.2- F. 9. Monitoring and Sampling Points

Programmes for environmental monitoring should be submitted as part of the application. These programmes should be provided as **Attachments F.2 to F.6** and meet the advice published by the Agency in the relevant BAT Note. For Landfills the additional **Attachments F.7 to F.8** should be completed. Furthermore for a landfill application the applicant must refer to the Agency *Landfill Monitoring Manual (2003)* for further details on monitoring requirements for proposed facilities.

Include details of monitoring/sampling locations and methods.

13a: Give an assessment of the impact on the environment of the emissions to sewer.

It is not envisaged that effluent from the facility to the WWTP will cause any significant impact on the environment. However a full assessment of the impact can be submitted to the Agency after analysis of the effluent is received.

16a: With increased activity due to increase in waste intake to 40,000 tpa, new plant operating and high volume C&D processing. It is anticipated that noise levels will change significantly. Give details of the assessment of impact of noise emissions on the environment and describe mitigating measures.

It is proposed to increase the waste intake at the facility from 16,500 tonnes to 40,000 tonnes per annum. It is now proposed to accept 12,000 tonnes of C&D waste per annum (consisting of timber, metal, soil and other C&D waste). A ballistic screener will be used to process incoming waste. It is proposed to continue the timber shredding operations outdoors. From the noise assessment carried out (Appendix D, Volume III of EIS) the results of noise monitoring have shown that noise levels currently on site are generally below the standard emission limits for daytime operations (55dB (A)). One result was in excess of this standard, but this was due to traffic noise outside the facility and not from site related activities (59dB (A)). All new plant operations will be located inside the materials recovery building therefore reducing noise emissions. However, the equipment is likely to be required to operate for longer periods and at a greater level of throughput. Therefore the reductions due to the enclosure will be offset by the increases due to activity levels. The increase in traffic levels due to the proposed increase in waste intake will result in an increase of 3 dB. The current National Roads Authority (NRA) design criteria for new road schemes is to limit the noise to an equivalent value of 65 dB (A). Even with the proposed increase of 3 dB from traffic noise from the facility the noise level at the noise monitoring locations will be within the guideline limit of 65dB(A) from the NRA. Therefore no mitigation measures are required for daytime operations. The new location of timber processing will be assessed for the impact of noise when details are available and will be forwarded to the Agency.