



Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

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Mr Sean Murphy
Killarney Waste Disposal Limited
Aughacurreen
Killarney
Co Kerry

13 April 2005

217-1

re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations

Dear Mr Murphy

I am to refer to the above referenced application for a waste licence relating to a facility at Killarney Waste Disposal Limited, Aughacurreen, Killarney, Co. Kerry. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Article 12 of the Waste Management (Licensing) Regulations.

You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to take the steps and supply the information detailed below:

ARTICLE 12 COMPLIANCE REQUIREMENTS

Section A Non-Technical Summary

A1a: Give a non-technical summary of the information provided in the application. The summary shall be a stand-alone document that does not refer to other **parts** of the application or **EIS**. A non-technical summary should identify all environmental impacts of significance associated with the carrying on of the activity, and describe mitigation measures proposed or existing to address these impacts. The non-technical summary as submitted does not meet these requirements.

Section B General

- B2a: Confirm that the site location map accurately sites the location of the facility. An update of section B should be provided if required.
- B2b: Provide a Site Plan drawn to scale appropriate to the size of facility (e.g. 1:1000 or 1:2500) and appropriately captioned. The Site Plan must clearly identify the boundaries of the activity in red and the North Point and contain grid references.
- B3a: Provide a copy of full planning permission (notification of decision was provided).

- B3b: Clarify whether the planning permission obtained (PP 2131/04) relates to the development as described in this waste licence application i.e. the intensification of activities including an annual waste intake of 40,000 tonnes. Explain the circumstances by which the EIS has not accompanied a planning application.
- B4a: Complete section B.4 of the application form. Note: It is proposed to discharge trade effluent to sewer (sewer includes the wastewater treatment plant). Provide a copy of any effluent discharge licence and/or agreement in place.
- B7.1a: Justify the principal activity having regard for the following note and question H1a below. Note: organic substances (class 2) include paper, cardboard, wood, plastic and residual food. Inorganic materials would include bricks, stones, concrete, tiles and glass.
- B7.3a The activities proposed includes the disposal of waste (other than hazardous waste) at a facility (other than a landfill facility) where the annual intake is likely to exceed 25,000 tonnes but be less than 100,000 tonnes. Therefore an outstanding fee of €2,000 is required.

Section C Management of the Facility

- Cl a: Provide the management structure and an organisational chart.

Section D Infrastructure and Operation

- D1a: It was noted during the site visit that the site was not fully secure and could be easily accessed. Provide details of securing the facility from access by unauthorised persons.
- D1b: Give details of the materials of construction for the new access road.
- D1c: Give details of the weight bridge including capacity, dimensions and record keeping system.
- D1d: Give details of the number of loaders to be used. Clarify that the plant currently on-site includes a bag opener and screener and not a shredder and trommel as described in the application. Give details of additional plant equipment proposed to cater for the increase in waste intake (e.g. ballistic screener as discussed during site visit). Indicate the locations of all process equipment on a plan. Give details of any outdoor processing areas.
- D1e: Clarify whether fuel will be stored on-site. Give details of storage arrangements as necessary.
- D1f: Give details of any proposed outdoor storage areas including location and materials to be stored.
- D1g: Give details of the final disposal route for domestic effluent from the puraflo. Drawing No. 02-034-J4-MCOS2 does not show storm drainage from the roof of the materials recovery building. Resubmit drawings with roof water drainage details. Give details of proposed trade effluent holding tank and indicate the location of tank on a plan. Give details of drainage and treatment of run-off from any proposed outdoor storage and processing areas.
- D1h: Give details of the materials recovery building and equipment compounds.
- D1i: It is proposed to process 17,000 tonnes/year of construction and demolition (C&D) waste, give details of C&D waste infrastructure including dust and noise abatement equipment and location within the facility.

- D2a: Give the throughput capacities of each unit of processing plant.
- D2b: Give details of proposed unit operations as carried out with proposed new processing plant (ballistic separator) include typical storage periods. Give details of the capability of processing plant to handle the various waste streams. Describe the management of processing plant when changing from one waste stream to another. Give details of emissions (odour, dust, noise, washings from processing plant and run-off from outdoor processing and storage areas as applicable).
- D2c: Give details of other services provided by Killarney Waste Disposal Limited and operated from the facility.
- D2b: Identify the final disposal/recovery destinations of all waste materials,

Section E Emissions

- E2a: Complete Tables E.2(i) for roof water emissions to surface waters.
- E3a: Complete Tables E.3(i) and E.3(ii) for emissions to sewer. Details of all List I and List II substances listed in the Annex to EU Directive 76/464/EEC (as amended), contained in any emission must be presented. All relevant information on the receiving sewer, including a description of effluent treatment/abatement systems and capacity should also be included.
- E4a: Complete Table E.4(i) for emissions to groundwater. Clarify whether trade effluent from timber shredding or run-off from outdoor storage of waste materials is directed to the storm water collection system. Where this is the case, describe the existing or proposed arrangements necessary to give effect to Articles 3,4,5,6, and 7 of Council Directive 80/68/EEC of 17 December 1979 on the protection of groundwater against pollution by certain dangerous substances.
- E.5a: Give details of the predicted noise levels as a result of the proposed increase in waste tonnage intake, high volume C&D processing and new plant operations.

Section F Control & Monitoring

- F1a: Describe the proposed treatment/abatement system for dust control from C&D waste and wood waste processing activities.
- F1b: Describe the domestic effluent treatment system proposed in line with EPA Wastewater Treatment Manuals and include details of final disposal route.
- F1c: Describe the proposed treatment/abatement system for effluent emissions from outdoor storage areas and outdoor processing areas. Where on-site treatment is proposed, give details of the typical reductions in List I and List II substances to be expected with the system.
- F1d: The percolation area as described in the application for the storm water treatment system does not correspond to the system installed (noted during site visit). Describe the system as installed and clarify whether the final disposal is to surface water or indirectly to groundwater. Amend application as necessary.
- F4a: Give details of monitoring locations for emissions to sewer.
- F5a: Give details of a monitoring location on the storm water treatment system prior to final disposal to the percolation area.

Section H Materials handling

H1a: It is proposed to intake 17,000 tonnes per annum of C&D waste but there is limited C&D infrastructure existing or proposed on-site. The applicant also indicated during a site visit that the primary business is in dry recyclables. In light of the foregoing, clarify the content of Table H1 (A) and Table H1(C) of the application.

Section I Existing; Environment & Impact of the Facility

- I1a: Describe the impact of dust emissions from the processing and storage of C&D waste and wood waste. Give details of proposed mitigating measures.
- I2a: Give details of the source(s) of contamination, described as originating from site in the aquatic ecology report, that are impacting on the Aghacureen drain (Appendix F, EIS, and page 20). Give details of measures to prevent the contamination and remedial measures where necessary.
- I2b: A mitigating measure identified in the EIS requires all waste delivery, storage and processing areas to be fully roofed, bunded and drained on an impervious surface to a holding tank. Yet another part of the EIS it is stated that timber processing is carried out outdoors and it is proposed to use the on-site storm water treatment system to treat effluent emissions. Clarify the situation relating to outdoor activities i.e. wood processing and storage. Give details of the assessment of impact of effluent emissions from outdoor storage of waste and processing of wood on the existing environment. Describe proposed mitigating measures.
- I2c: It is stated in the EIS that domestic effluent is discharged to a septic tank and puraflo. There is no description of the final disposal route. During a site visit it was noted that a puraflo was not installed as yet and domestic effluent was being discharged to the storm water lagoon/reed/percolation system. Clarify the proposed treatment and disposal route having regard to planning permission requirements. Give details of the assessment of impact of domestic effluent on the existing environment and describe proposed mitigating measures.
- I3a: Give an assessment of the impact on the environment of the emissions to sewer.
- I6a: With increased activity due to increase in waste intake to 40,000tpa, 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.

Section J Accident Prevention & Emergency Response

- Ja: Describe the arrangements for abnormal operating conditions (malfunctions or momentary stoppages).

Section L Statutory Requirements

- L1a: Indicate how all the requirements of Section 40(4)[(a) to (i)] of the Waste Management Acts 1996 to 2003 will be met. Applicants should also describe how the proposed facility will comply with the requirements of BAT. In particular reference should be made to the considerations referred to in Annex IV of Council Directive 96/61/EC concerning integrated pollution prevention and control.
- L2a: Clarify whether your insurance covers both public and environmental liability.
- L2b: Provide a copy of the Audited Accounts for the previous year

Your reply to this notice should include a revised non-technical summary which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Please supply the information in the form of a one original plus three copies within **two months** of the date of this notice. In addition submit one copy on a CD-ROM to the Agency. The e-file should be saved as a 'pdf' file, read only status.

Please note that the application's register number is **217-1**. Please direct all correspondence in relation to this matter to the *Licensing Unit, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



Kieran O' Brien

Office of Licensing & Guidance

