



**OFFICE OF
LICENSING &
GUIDANCE**

**REPORT OF THE TECHNICAL COMMITTEE ON
OBJECTIONS TO LICENCE CONDITIONS**

TO:	Directors	
FROM:	Technical Committee	- LICENSING UNIT
DATE:	26/6/2006	
RE:	Objection to Proposed Decision for Killarney Waste Disposal Limited, Aughacurreen, Killarney, Co. Kerry. Waste Reg: 217-1	

Application Details	
Class(s) of activity:	3 rd Schedule: 11, 12, 13 4 th Schedule: 2(P), 3, 4, 11, 12, 13
Location of activity:	Aughacurreen, Killarney, Co. Kerry.
Licence application received:	03/02/05
PD issued:	16/3/2006
First party objection received:	12/4/2006
Third Party Objection received	None
Submissions on Objections received:	None
Article 26/27 (Waste) issued:	None
Additional Information received:	None
Article 35 [Waste] extension of time	None

Company & Facility

The application relates to an existing facility run by Waste Disposal Limited, who were granted a waste permit by Kerry County Council in December 2003 to operate a materials recovery facility at Aughacurreen, Killarney Co. Kerry (WP23/03). The facility is currently permitted to handle 16,500 tonnes/annum of non-hazardous waste. The applicant proposes to intensify the waste acceptance activities to 40,000 tonnes per annum. This intensification will increase the tonnage of each waste type currently being accepted and will require additional infrastructure. The material recovery building has already been extended to a total area of 3,223m².

The facility is located in a rural area approximately 4km northwest of Killarney town. There are approximately 20 residences within 500m from the boundary of the facility (13 residences within 100m). Most residences are located on a ribbon development

on a nearby road. The site is 2.2 hectares and has a land drain flowing through it. Land use in the area is a mix of commercial forest and agricultural land.

No third party submissions were received in relation to the application.

This report considers the first party objection received on 12/4/2006. No other objections were received.

Consideration of the Objection

The Technical Committee, comprising of Kevin Motherway (Chair) and Niamh O'Donoghue, has considered all of the issues raised in the Objections and this report details the Committee's comments and recommendations following the examination of the objections together with discussions with the Inspector, Ann Marie Donlon, who also provided comments on the points raised. The Technical Committee consulted Agency Inspector Caoimhin Nolan and Breege Rooney (OEE) in relation to CCTV data storage issues.

First Party Objection

The applicant makes 7 points of objection, with all points either relating to site infrastructure or work practices. Objections are quoted directly except where their length is excessive.

A.1. Condition 1.8.3

"This condition requires that the facility shall not operate or accept/despatch waste on Sundays or Bank Holidays without the agreement of the Agency. The public require a collection service on Bank Holidays. Therefore to accommodate this collection service the facility will have to be open to accept waste. We would request that the Agency amend this condition to allow acceptance of waste on Bank Holidays."

Submission(s) on Objection: None

Technical Committee's Evaluation:

Condition 1.8.3 of the PD states "The facility shall not operate or accept/despatch waste on Sundays or on Bank Holidays without the agreement of the Agency." It is therefore already open to the applicant to agree service on Bank Holidays with the Agency under the terms of the PD.

Recommendation: No Change

A.2. Condition 3.3.4

"This condition requires that a CCTV system recording all truck movements into and out of the facility be installed and that copies of recordings kept on site for

inspection. The storage of such data for indefinite periods of time is considered to be impractical and we would ask that the Agency amend this condition to read "...copies of recordings shall be kept on site for a minimum period of 2 months after recording and made available to the Agency on request".

Submission(s) on Objection: None

Technical Committee's Evaluation:

The purpose of the retention of CCTV recordings is to allow the Agency to inspect records of vehicle movements. This would be especially pertinent in the event of a pollution event of acceptance of unauthorised material at the facility, evidence of which may not arise for several months after the event. Given modern CCTV technology and the ability to store data in convenient digital format (e.g. up to 16 cameras on 24 hours a day can be stored on one 250 GB drive and backed up as necessary. The required system would be in use 13 hours per day on far fewer cameras) it is considered both practical and necessary that records be kept on-site, available for inspection. This is a general condition in licences. Notwithstanding it seems appropriate that the length of time that records are required to be stored on-site should have a limit, given the practicalities involved. This matter should be agreed with the OEE, based on the operation of the facility and their perceived needs.

Recommendation: Amend Condition 3.3.4 to read as follows:

The licensee shall install a CCTV system, which records all truck movement into and out of the facility. The CCTV system shall be operated during the period referred to in condition 1.8.2. Copies of recordings shall be kept on site for such period as maybe agreed with Agency and made available to the Agency on request.

A.3. Condition 3.7

"This condition requires that the licensee provide a wheel wash. It is considered that the nature of the operation in which trucks will offload waste into a covered building and will at all times operate on a concrete slab which will be cleaned by a lorry road sweeperaction brush means that the use of a wheel wash is unnecessary. We would therefore request that the Agency remove this requirement."

Submission(s) on Objection: None

Technical Committee's Evaluation:

Given that the vehicles servicing the facility may come into contact with a variety of wastes it is considered best practice that such potentially contaminated vehicles undergo a regular wheel wash as part of their cycle through the facility. This will minimise the dispersal of any potential contaminants on public roads and in the environment in general.

Recommendation: No change.

A.4. Condition 3.14

This Condition states that silt traps and a Class 1 full retention separator are to be installed at all stormwater treatment discharge points. There are three stormwater discharge points at the facility: R1 and R2 and SW 1 (currently referred to as GW 1 in the PD). R1 and R2 will consist solely of roofwater and are to be discharged to a land-drain. Discharge from SW1 is to pass through treatment-train consisting of a lagoon and a reed bed system. Based on the uncontaminated nature of roof water (and using a UK Environment Agency decision tree) it asserted that there is no need for silt traps or separator on this emission. Based on the reported effectiveness of lagoon and reed bed systems, the need for silt trap and separator on the SW1 discharge is also questioned. The applicant therefore requests the removal of the condition from the licence.

Submission(s) on Objection: None

Technical Committee's Evaluation:

Given the uncontaminated nature of roof water it is not considered necessary to install a silt trap and Class I interceptor on the storm water discharges emanating from roofs and discharged directly to soakaway/land drain pipe as is the case for R1 and R2.

While the use of lagoon and wetlands are commendable, these require regular servicing and maintenance to ensure they are effectively treating effluent and in the event of a failure in these systems any discharge at SW1 could potentially cause pollution. It is therefore deemed necessary to provide a Class I full retention separator for the SW1 discharge point and that it be serviced appropriately.

Recommendation:

Amend Condition 3.14 to read as follows:

The licensee shall install (within six months of date of grant of licence) and maintain **a silt trap and an oil separator at the facility to ensure that all storm water discharge to emission point SW1** passes through a silt trap and oil separator prior to discharge. The separator shall be a Class I full retention separator and the silt traps and separator shall be in accordance with I.S. EN 585-2:2003 (separator systems for light liquids). **The location of SW1 is to be agreed with the Agency prior to construction of the storm water management system.**

A.5. Condition 6.17.1

"This requires that the floor of the materials recovery building handling mixed municipal waste shall be washed down and cleared of all waste at the end of the working day. It is felt that this is impractical and would create unnecessary effluent. We request that the Agency amend this condition as follows: 'The floor of the materials recovery building handling mixed municipal waste shall be dry brushed and cleared of all waste within 24 hours. The floor shall be washed weekly. A cleaning procedure will be developed and submitted to the Agency within one month of the date of grant of licence'.

Submission(s) on Objection: None

Technical Committee's Evaluation:

The purpose of the condition is to minimise odours generated on-site and deter vermin. The cleaning of the floor of the materials recovery building on a daily basis is considered as "good housekeeping" by the Agency. The washing of the floor on a daily basis may generate excessive quantities of dirty water and a weekly washing regime has been applied in other licences. Notwithstanding the floor should be washed on a daily basis where the waste being processed has a large putrescible fraction.

Recommendation: Amend Condition 6.17.1 to read as Follows:

The floor of the materials recovery building handling mixed municipal waste shall be **cleared of all waste at the end of the working day. The floor shall be washed on a weekly basis and as necessary to meet the conditions of the Licence.** The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied.

A.6. Schedule A.2

“Schedule A.2: We request the Agency include a note in Table A2 to read as follows: ‘The individual limitation on waste streams may be varied with the agreement of the Agency subject to the overall total limit staying the same.’ The reason for this addition is due to the fact that the amount of dry recyclables accepted as a proportion of the total waste intake is likely to increase as recycling rates improve.”

Submission(s) on Objection: None

Technical Committee’s Evaluation:

This objection is reasonable, with several Waste Licences containing such a note.

Recommendation: Amend Schedule A.2 to read as follows (Change Highlighted):

A.2 Waste Acceptance

Table A.1 Waste Categories and Quantities

WASTE TYPE ^{Note 1}	MAXIMUM (TONNES PER ANNUM)
Mixed municipal waste	15,500
Organic waste (kitchen and canteen waste)	6,000
Dry recyclable wastes	6,500
Non-Hazardous Construction and Demolition (C&D)	12,000
TOTAL	40,000

Note 1: Any proposals to accept other compatible waste streams must be agreed in advance with the Agency and the total amount of waste must be within that specified.

Note 2: The individual limitation on waste streams may be varied with the agreement of the Agency subject to the overall total limit staying the same.

A.7. Condition Schedule C.2.3

This objection refers to monitoring requirements with regard to the stormwater discharge points. The applicant feels that monitoring points R1 and R2 do not require weekly monitoring as these are runoff points collecting rainwater only and requests that the Agency amend this Schedule to require annual sampling of run-off at these locations and that visual inspections would be carried out on a weekly basis.

The applicant also seeks to clarify the situation regarding the discharge from the reed bed area. It was originally intended that the discharge from the reed bed was to be to groundwater. Therefore, in the original Waste Licence application, the discharge point was denoted GW1 and it was located after the reed bed. However, as clarified in further information supplied to the Agency (Article 12 Compliance September 2005, p 9) the discharge is to surface water. In that submission, GW1 was renamed SW1. Therefore, with the discharge being to surface water, the applicant requests that the requirements for monitoring at this location be amended to require annual monitoring and weekly visual inspection and that the Agency change the monitoring point GW1 to SW1.

Submission(s) on Objection: None

Technical Committee's Evaluation:

Given that emission points R1 and R2 are emission points for clean roof water there is very low risk of this water containing contaminants. Regular weekly visual inspection, as well as physio-chemical testing on an annual basis, as requested by the applicant, are deemed appropriate. The applicant may apply to discontinue the physio-chemical analysis at these points, if the analysis demonstrates consistently clean roof water.

The renaming of GW1 as SW1 is appropriate given that the emission point is to surface and not groundwater as clarified by the applicant. A new map clarifying the names and locations of all emissions points and monitoring points should be submitted to OEE to ensure no mix-ups occur.

Recommendation: Amend Condition 6.14 to read as follows:

6.14 Monitoring Locations

The licensee shall, within three months of the date of grant of this licence, submit to the Agency an appropriately scaled drawing(s) showing all the monitoring locations **and emission points** that are stipulated in this licence. The drawing(s) shall include the reference code of each monitoring **and emission** point and the eight-digit national grid reference of each monitoring **and emission** point. **Revised drawings shall be submitted as part of any agreements or variations in monitoring arrangements agreed with the Agency.**

Recommendation: Amend Schedule C.2.3 to read as follows (table layout redrafted and changes in content highlighted):

C.2.3 Monitoring of Storm Water Emission

Emission Point Reference No.: R1, R2 and **SW1**.

Parameter	R1, R2 Monitoring Frequency	SW1 Monitoring Frequency	Analysis Method/Technique
pH	Anually	Weekly	pH electrode/meter
Conductivity	Anually	Weekly	Standard Method
Suspended Solids	Anually	Weekly	Standard Method
Total Ammonia (as N)	Anually	Weekly	Standard Method
Sulphate	Anually	Weekly	Standard Method
Chloride	Anually	Weekly	Standard Method
Heavy metals Note 1	Anually	Biannually	Atomic Absorption/ICP
Visual Inspection	Weekly	Daily	Sample and examine for colour and odour

Note 1: The sum of antimony, arsenic, cadmium, chromium, copper, lead, mercury, nickel, selenium, tellurium, thallium and tin.

Overall Recommendation

It is recommended that the Board of the Agency grant a licence to the applicant

- (i) for the reasons outlined in the proposed determination and
- (ii) subject to the conditions and reasons for same in the Proposed Determination,
- and
- (iii) subject to the amendments proposed in this report.

Signed

Kevin Motherway
for and on behalf of the Technical Committee