

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

TO:	Directors	
FROM:	Technical Committee	- LICENSING UNIT
DATE:	14 th August 2006.	
RE:	Objection to Proposed Decision for Greenstar Ltd., Register No. W0220-01.	

Application Details	
Class(s) of activity:	3 rd Schedule: 11, 12 and 13. 4 th Schedule: 2(P), 3, 4 and 13.
Location of activity:	Ramstown, Gorey, Co. Wexford.
Licence application received:	24/06/2005.
PD issued:	11/05/2006.
First Party Objection received	01/06/2006 Greenstar Limited.

Company

This report relates to an application by Greenstar Ltd., for a waste licence to facilitate the further development of an existing waste transfer station at Ramstown, Gorey, Co. Wexford. The premises was previously owned and operated by Seamus Kelly and Sons who provided a collection service for commercial, domestic and non-hazardous construction and demolition waste in the area. Seamus Kelly & Sons have been operating at the Gorey facility since 1996. The principal activity proposed is Class 2 of the Fourth Schedule, i.e., recycling or reclamation of organic substances which are not used as solvents (including composting and other biological processes).

The existing site covers an area of 0.28 hectares and is located adjacent to Gorey Business Park, an area zoned for industrial and commercial use. The facility is primarily surrounded by industrial and commercial developments with mixed agricultural and some residential developments. Access is provided by the main Dublin to Wexford (N11) road, which runs approximately 300m to the west of the facility.

Greenstar Ltd., purchased the facility in 2005 with a view to increasing the annual volume of non-hazardous waste accepted at the facility from 16,500 tonnes to 30,000

tonnes by 2010. As per the *Schedule A: Limitations* of the PD the waste material accepted at the facility shall have the following constituents;

- (i) Household waste (18,000 tpa).
- (ii) Commercial waste (6,000 tpa)
- (iii) Industrial waste (2,000 tpa), and
- (iv) Non-hazardous construction and demolition waste (4,000 tpa).

There were 4 valid submissions made in relation to this application each of which was considered by the Board at PD stage. The Directors approved the recommendation to grant a draft waste licence and a PD was issued by the Agency on the 11th May 2006.

Consideration of the Objection by Technical Committee

This report considers one valid first party objection, as set out below. The main issues raised in the Objection are summarised below and where appropriate under various different headings. However, the original Objection should be referred to at all times for greater detail and expansion of particular points.

The Technical Committee, comprising of Mr. Breen Higgins (Chair), and Dr. Karen Creed has considered all of the issues raised in the Objection and this report details the Committee's comments and recommendations following the examination of the objections together with discussions with the inspector, Ms. Bernie Murray, who also provided comments on the points raised.

First Party Objections

No.	Objector Name and Address	Date Received
1	Greenstar Limited.	01 June 2006.

1. Greenstar Ltd., La Vallee House, Fassaroe, Bray, Co. Wicklow.

The first party submitted a three page letter addressed to the Agency in the form of a short introduction and objections to the PD on a number of grounds.

For ease of comparison the issues raised will be addressed in point format as per the Objection, as follows:

Condition 3.1

'The licensee shall establish all infrastructure referred to in this licence in advance of the commencement of the licensed activities or as required by the conditions of this licence.'

The objection refers to the fact that the facility currently operates under a waste permit granted by Wexford County Council. It is proposed that Greenstar Ltd., shall

apply for planning permission and commence detailed design, tender and construction of the infrastructure listed in *Schedule D* of the PD. The first party objector expresses the view that this process is likely to involve a period of some months and request that an 18 month period from the date of grant of licence be provided to enable the company carry out the necessary works.

Technical Committee’s Evaluation:

It is clear that the waste acceptance capacity of 5,000 tonnes as outlined in the waste permit for the facility (Ref. WP/05/15) has been exceeded by some 11,500 tonnes. The infrastructure required in the PD is linked to waste acceptance in all cases. In light of this fact and in order to expedite the development of the necessary site infrastructure it is deemed appropriate to allow for timeframes for the design, tender and construction process to be agreed with the Office of Environmental Enforcement (OEE) of the Agency.

Recommendation

Amend the wording of Condition 3.1 to include, ‘...conditions of this licence, unless otherwise agreed in writing with the Agency’.

Condition 3.2

‘Unless otherwise agreed in writing, the building (s) to enclose the waste activities shall be constructed as described in the Application.’

The first party objection refers to the comments made in relation to Condition 3.1, i.e., that a period of time should be provided in order to facilitate the design, tender and construction works on-site.

Technical Committee’s Evaluation:

BAT for the waste sector requires that waste shall be processed within an enclosed waste transfer building. The PD facilitates communication with the Agency with regard to the construction of waste processing buildings on-site. It does not specify a time limit for the construction but does request that the building be developed in line with the application documentation. The TC considers this to be an appropriate approach to the proposed development works planned for the facility.

For clarity the TC recommends a very minor typographical change to the condition so as to replace the term ‘building (s)’ with the term ‘building(s)’.

Recommendation

The wording of the Condition 3.2 should be amended to read as follows: <i>Unless otherwise agreed in writing, the building(s) to enclose the waste activities shall be constructed as described in the Application.</i>
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Condition 3.6.2

'The licensee shall provide, and maintain an impermeable hardstanding surface in the areas of the facility shown on Drawing No. 1.1.2. In addition the floor of the buildings and hardstanding areas at the facility shall be concreted and constructed to British Standard 8110 or an alternative as agreed by the Agency. The licensee shall remedy any defect in concrete surfaces within ten working days.'

As with Conditions 3.1 & 3.2 the first party express the view that a period of time should be provided for in order to allow the necessary works to take place on-site.

Technical Committee's Evaluation:

BAT for the waste sector requires that all hardstanding areas within the waste transfer station shall be developed in accordance with BS 8110. The PD does not specify a time limit for the construction but requests that the hardstanding be developed in line with the application documentation or to an alternative standard agreed with the Agency. As with the objection raised to Condition 3.2 the TC considers the approach outlined in the PD to be appropriate for the proposed development of hardstanding areas within the facility. However, the TC recommends a period of up to ten days for the remediation of any defects to concrete surfaces on site from the time of detection by the licensee.

Recommendation

Amend wording of the third sentence of Condition 3.6.2 to read <i>'The licensee shall remedy any defect in concrete surfaces within ten working days of such a defect being detected by the licensee'</i> .

Condition 3.11.1

'The licensee shall provide and maintain a Wastewater Treatment System at the facility for the treatment of sanitary effluent arising on-site. The percolation area shall satisfy the criteria set out in the Wastewater Treatment Manual, Treatment Systems for Single Houses, published by the Environmental Protection Agency.'

The first party objector proposes an alternative to on-site treatment of sanitary effluent by means of a Wastewater Treatment System. It is requested that Condition 3.11.1 be amended to allow for the containment of sanitary effluent in a storage tank pending its consignment from site to an appropriate wastewater treatment facility.

Technical Committee's Evaluation:

The application documentation (Attachment L.1.1) and the Environmental Impact Statement (Appendix D) for the facility clearly outline proposals for an on-site wastewater treatment system for the purposes of handling domestic wastewaters from the offices and canteen on-site. The TC considers it appropriate that, subject to the requirements of a site suitability assessment being satisfied, the requirement for an on-site system be retained.

Recommendation

No change.

Condition 6.3.1

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

The objector expresses the view that where materials such as wood are stored it may not be necessary to wash down areas. This activity, they state, could amount to a needless waste of clean water and as such request that the Condition be rephrased to state ‘...washed down or cleaned...’

Technical Committee’s Evaluation:

Condition 6.3.1 reflects Best Available Techniques (BAT) for the waste sector and requires that floor areas of the waste transfer building shall be washed down and cleaned on a weekly basis and where putrescible wastes are handled floor areas shall be washed down and cleaned on a daily basis. The requirements on areas where there is a lower risk of impact/impairment on the surrounding environment and which are utilised exclusively for the handling of materials such as wood are less prescriptive.

Recommendation

Amend wording of the second sentence of Condition 6.3.1 to read <i>‘The floor of the storage bays used for recovered wastes (waste timber and construction and demolition waste) shall be washed down or cleaned on each occasion such bays are emptied, or as a minimum on a weekly basis.</i>

Condition 6.16

‘The licensee shall ensure that groundwater monitoring well sampling equipment is available/installed on-site and is fit for purpose at all times. The sampling equipment shall be to Agency specifications.’

The licensee shall employ consultants, who will be on-call and capable of sampling within 24 hours, to sample groundwater on their behalf. The consultants will retain ownership of any equipment used in the sampling and as such the first party believe it to be unnecessary to store such equipment on-site.

Technical Committee’s Evaluation:

The TC notes the views of the first party and agrees that it is reasonable that all groundwater sampling equipment be provided by consultants employed by Greenstar. However, the licensee shall ensure that all groundwater monitoring infrastructure shall be available/installed on-site and that this infrastructure will be fit for purpose at all times.

Recommendation

Amend wording of Condition 6.16 to read <i>‘... that all groundwater monitoring infrastructure is available/installed on-site and is fit for purpose at all times. The infrastructure shall be to Agency specifications.</i>

Schedule C.2.2

The objector requests that the monitoring frequency of Chlorides be extended to monthly and, instead, electrical conductivity shall be monitored on a daily basis. The first party objector states that electrical conductivity would provide an indicator of chloride amongst other parameter levels.

Technical Committee's Evaluation:

The TC notes that this discharge shall continue until such time as the infrastructural works detailed in Condition 3 are carried out by the licensee. In view of this fact, **it is deemed reasonable and appropriate to request that the licensee carry out daily monitoring of Electrical Conductivity with monitoring of Chloride levels being undertaken on a monthly basis.**

Recommendation

Amend Schedule C.2.2 Monitoring of Emissions to Ground

Emission Point Reference No.: Discharge holding tank to Percolation ^{Note 1}

Parameter	Monitoring Frequency	Analysis Method/Technique
pH	Daily	pH electrode/meter and recorder
Electrical Conductivity	Daily	Standard Method
Chemical Oxygen Demand	Monthly	Standard Method
Sulphate (SO ₄)	Monthly	Standard Method
Chloride	Monthly	Standard Method
Ammonia (as N)	Monthly	Ion selective electrode
Total Phosphorus (as P)	Quarterly	Standard Method
Metals (specify)	Quarterly	Atomic Absorption/ICP
Organic Solvents ^{Note 2}	Quarterly	Gas Chromatography
Oils, fats & greases	Quarterly	Standard Method

Note 1: This monitoring may cease following the covering of the yard area and cessation of discharge of run-off to percolation area.

Note 2: Screening for priority pollutant list substances. (such as US EPA volatile and/or semi-volatile compounds). This analysis shall include those organic solvents in use in the process, which are likely through normal process operations to be diverted to the waste water streams.

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

Signed

Breen Higgins

Inspector

for and on behalf of the Technical Committee