



OFFICE OF LICENSING & GUIDANCE

INSPECTORS REPORT ON A LICENCE APPLICATION

To:	Directors	
From:	Stuart Huskisson	- Licensing Unit
Date:	3 rd January 2007	
RE:	Application for a Waste Licence from Greyhound Recycling and Recovery Limited, Crag Avenue, Clondalkin Industrial Estate, Clondalkin, Co. Dublin. Licence Register No. W0205-01.	

Application Details

<p>Type of facility:</p> <p>Classes of Activity (P = principal activity):</p> <p>Quantity of waste managed per annum:</p> <p>Classes of Waste:</p> <p>Location of facility:</p> <p>Licence application received:</p> <p>EIS Required:</p> <p>Notice under Article 8 issued:</p> <p>Information under Article 8 received:</p> <p>Notices under Article 14 issued:</p> <p>Information received under Article 14:</p> <p>Supplementary material submitted:</p> <p>Third Party Submissions:</p> <p>Site Inspection:</p>	<p>Non-Hazardous Materials Recovery Facility</p> <p>3rd Schedule: 11, 12, 13</p> <p>4th Schedule: 2, 3, 4(P), 8, 9, 11, 12, 13</p> <p>250,000 tonnes</p> <p>Dry Recyclable Non-Hazardous Household Commercial & Industrial Construction & Demolition Hazardous Household</p> <p>Crag Avenue, Clondalkin Industrial Estate, Clondalkin, Co. Dublin.</p> <p>08/04/04</p> <p>Yes</p> <p>07/05/04</p> <p>24/05/04</p> <p>21/07/04, 09/06/05, 13/01/06, 25/09/06</p> <p>01/03/05, 08/07/05, 28/04/06, 19/06/06, 22/06/06, 24/10/06, 21/11/06</p> <p>11/07/06, 01/09/06, 04/09/06</p> <p>Two</p> <p>Site notice inspected 02/06/04 - EC 17/02/06 - SH</p>
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1. Facility

Greyhound Recycling and Recovery Ltd. (GRR) have applied to operate a new materials recovery facility and transfer station in Clondalkin, Co. Dublin. The 4.5 ha site is located in an industrial estate which is zoned for light industrial use and was previously used as a car storage and distribution compound. Since the submission of the waste licence application, GRR have been granted planning permission for the site by South Dublin County Council, (SD03A/0838 - July 2005 and SD06A/04/04 – July 2006) and have obtained a waste permit (Ref. No. WP050) from South Dublin County Council. GRR have been operating the site as a dry recyclables recovery facility under their waste permit since May 2005.

GRR currently hold a waste licence (Reg. No. W0095-02) for a waste transfer facility which they operate at Knockmitten Lane in the Western Industrial Estate, Dublin 12.

The proposed facility in Clondalkin will consist of two purpose built waste processing buildings where waste will be stored, separated and processed. The facility will accept up to 250,000 tonnes of waste per annum and the principal waste stream will be mixed commercial and industrial waste. Waste will be unloaded and processed within the waste recovery buildings. A maximum of 33,600 tonnes of putrescible waste will be accepted at the facility, primarily source segregated organic waste and the organic contaminant fraction from other commercial and industrial waste. The site operations will also include biodiesel production, processing a maximum of 2,500m³/annum of waste edible oil and fat (EWC 20 01 25) to produce biodiesel.

The applicant proposes to operate the facility 24 hours a day, seven days a week and employ between 60-80 people.

Class 9 of the Fourth Schedule of the Waste Management Acts 1996 to 2005 'Use of any waste principally as a fuel or other means to generate energy' has been refused as Class 8 of the Fourth Schedule can accommodate the re-refining of waste edible oil and fat and its subsequent use in vehicles.

The commencement of the Scheduled Activity is considered to occur on the date that the quantity of waste processed under the existing waste permit exceeds the specified threshold, or when any activity not specified in the waste permit but specified in the RD is commenced. **Condition 11** requires the licensee to notify the Agency one month prior to the intended date of commencement of the Scheduled Activity.

The extended time period required to progress this waste licence application has been due to a number of factors, particularly, delays by the applicant in responding to requests for further information and changes to the proposed facility as requested by the applicant.

2. Operational Description

Table 1: Proposed waste types and quantities:

Waste Type	Tonnes per annum	Comment
Commercial & Industrial	224,000	Maximum quantity of putrescible waste shall not exceed 33,600 tonnes per annum, of which a maximum of 2,500 tonnes/annum shall be waste edible oil and fats (EWC 20 01 25), unless otherwise agreed by the Agency.
Dry Recyclable Household	20,000	From green bins and civic waste facility
Construction & Demolition	3,000	
Household and Commercial Hazardous	3,000	20 01 21 Fluorescent tubes and other mercury-containing waste 20 01 23 Discarded equipment containing chlorofluorocarbons 20 01 27 Paints, inks, adhesives and resins containing dangerous substances 20 01 34 Batteries and accumulators other than those mentioned in 20 01 33 20 01 35 Discarded electrical and electronic equipment other than those mentioned in 20 01 21 & 20 01 23 containing hazardous components 20 01 36 Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
TOTAL	250,000	

The RD includes provision for the tonnages of the individual non-hazardous waste types to be changed with the agreement of the Agency subject to the total limit for non-hazardous waste

and the overall total staying the same. It is envisaged that the maximum tonnage will be reached within a five-year period.

In total the facility will consist of four buildings: this includes the existing Waste Recovery Building which will be refitted to accommodate proposed activities, a second proposed Waste Recovery Building (Planning permission granted July 06), an existing office /workshop/garage building on-site, and a new two-storey office building close to the site entrance (Planning permission granted July 05).

The RD requires all waste off-loading and processing to be carried out indoors.

The processes carried out will typically comprise of the following:

- Manual picking of mixed Commercial and Industrial (C&I) waste.
- Shredding - Limited to paper, cardboard, tetra-pak and residual waste from sorting and segregation, unless otherwise agreed by the Agency.
- Use of a trommel to remove fine organic fraction.
- Bailing of residual mixed waste and bailing of dry recyclables
- Mechanical and manual sorting of Construction and Demolition (C&D) waste.
- Organic/Putrescible waste inspection and container loading.
- Storage of Waste Electrical and Electronic Equipment (WEEE), glass, wood, metal and household hazardous waste prior to being sent for recovery/disposal.

The existing Waste Recovery Building has a floor area of 4,909m² and the additional proposed Waste Recovery Building will have a total floor area of 4,283m². Delivery vehicles will only off-load indoors. The doors of the Waste Recovery Buildings will be fast activating to minimise nuisance caused by dust and odour emissions. **Condition 6** requires fast-action doors (or equivalent approved by the Agency) to be installed and maintained on the entry/exit points of the Waste Recovery Buildings prior to the commencement of scheduled activity. The infrastructure will include two balers, one trommel, one shredder, one compactor and a quarantine area. **Condition 3** requires that the licensee shall, prior to the commencement of the Scheduled Activity, provide and maintain a designated Waste Inspection Area and a Waste Quarantine Area within the Waste Recovery Buildings.

2.1 Biodiesel Production Process

GRR propose to produce biodiesel by the transesterification of waste edible oil and fat. This waste will be coarse filtered and the water removed, prior to storage in one of three tanks (each with a maximum capacity of 20,000 litres). The pre-treated waste will then be transferred into a processing vessel where it will be heated to approx 50°C. A quantity of methanol (20-25% by volume) shall be added to a mixer tank and slowly mixed with a catalyst (either Sodium Hydroxide or Potassium Hydroxide – 0.5-0.8% by weight) to create methoxide. The methoxide will be added to the processing vessel, the contents agitated for 40-60 minutes and then allowed to settle overnight.

‘Overnight the contents will separate into two distinct layers, a glycerine layer and a methyl ester (biodiesel) layer. The glycerine will be removed under gravity to a vacuum vessel’.

Glycerine Treatment, Methanol Recovery

‘The glycerine will be subjected to a partial vacuum and heated to 50°C. This will cause any remaining methanol from the reaction to evaporate. A water-cooled condenser will recover the methanol, which shall be placed in the mixer tank for reuse. The remaining glycerine will be placed in a glycerine storage vessel. The cooling water used in the condenser will be utilised in the diesel-washing step’.

Biodiesel Washing

The biodiesel will be subjected to a three-stage wash process; each stage will use c.2,000 litres of recycle wash water, rainwater or mains water per 10,000 litre batch. The water will be sprinkled over the biodiesel and allowed to settle overnight to the bottom of the wash vessel. The settled water from the first and second washes will be sent to the wash water settlement vessel, from the final wash the water will be sent to the recycle wash water vessel (for use in the first wash stage for the next biodiesel batch).

'All wash water shall be sent to the Wash Water Settlement Vessel prior to discharge. The wash water will contain trace amounts of biodiesel which settles to the top of the vessel, periodically this biodiesel will be pumped from the vessel back to one of the water wash vessels where it will be sent through the washing process again'. Wash water (6 m³/day) will be disposed of to sewer (approximately 8-hours per day), having been passed through a Class I full retention interceptor.

Product Polishing

'The biodiesel may contain between 0.1-0.5% water after the water washing stage. This must be reduced to less than 0.05% to pass the European standard for biodiesel EN14214. Biodiesel will be pumped from the water wash vessel through a heat exchanger into a vacuum vessel and the biodiesel heated to 120°C under a partial vacuum. Any residual water will evaporate from the diesel. The evaporate will be passed through a water-cooled condenser. The resultant condensate will be fed into the wash water settlement vessel'.

'The biodiesel will exit the vacuum vessel, pass back through a heat exchanger (to heat the incoming biodiesel) and then go through a 15-micron and a 3-micron filter. The biodiesel will be stored in one of two finished product storage vessels'.

Condition 6 requires the applicant to submit an annual statement as to the measures adopted at the site in relation to water reuse within the biodiesel production process.

Condition 8 requires the applicant to develop written procedures, for the delivery, receipt and transfer of waste edible oil and fat and for the transfer of biodiesel, prior to the commencement of biodiesel production. **Condition 6** requires that all the biodiesel produced shall meet the requirements of CEN EN 14214 or equivalent standard agreed in advance by the Agency. Biodiesel product that fails to meet this standard shall be reprocessed at the facility or sent off-site for recovery or disposal at an appropriate facility.

Condition 6 requires that a test programme be carried out within three months of the commencement of operation of the biodiesel production equipment. This must establish all criteria for the control and management of the equipment.

The specific location of the proposed biodiesel production operation has not been indicated.

Condition 3 requires the biodiesel production plant to be located within a suitable building as agreed by the Agency.

2.2 Council Directive 1999/13/EC-Solvents Directive

Category 19 of Annex IIA of the Solvents Directive relates to 'Vegetable Oil and Animal Fat Extraction and Vegetable Oil Refining Activities' and includes 'the purification of fats and vegetable oils derived from seeds, vegetable matter and/or animal matter.' It is considered that the use of methanol in the proposed biodiesel production process does not constitute a 'purification' process, as the majority of the methanol addition 'undergoes a chemical change' in the transesterification reaction, producing a new product; methyl ester (biodiesel). Methanol is a volatile organic compound, however, it is not used as an organic solvent in the proposed process.

The biodiesel production process, therefore, is not considered to fall within the scope of the Solvents Directive (*EU Council Directive 1999/13/EC on the limitation of emission of volatile organic compounds due to the use of organic solvents in certain activities and installations*), however, conditions have been included in the RD to ensure the recording and minimisation of methanol usage and releases to atmosphere. **Condition 6** requires the licensee, to calculate and report methanol transfer volumes, mass emissions and releases and to produce an annual 'Methanol Management Plan'.

2.3 Waste Electrical and Electronic Equipment and Household Hazardous Waste

The applicant proposes to accept and store discarded equipment containing chlorofluorocarbons (CFC's) (EWC 20 01 23), WEEE, fluorescent tubes, batteries and paints inks and resins, prior to shipment of these materials to licensed facilities for processing and recovery. A maximum of 3,000 tonnes of hazardous waste shall be accepted at the facility per annum for onward transfer. No processing of hazardous waste will take place on site.

3. Use of Resources

The applicant estimates that annual fuel usage will be c. 550,000 litres of road diesel and c. 26,000 litres green diesel. Electricity usage will be c. 400,000 kWh/annum and water usage c. 5,400 m³/annum.

Condition 7 requires the applicant to carry out an audit of the energy efficiency of the site and identify opportunities for reduction in the quantity of water and an assessment of the efficiency of use of raw materials. Reductions and improvements identified shall be incorporated into the Schedule of Environmental Objectives and Targets.

4. Emissions

4.1 Emissions to Atmosphere

Dust/Odour:

The main potential source of dust from the facility is from the Waste Recovery Buildings where dust emissions may arise from waste off-loading, shredding and sorting. The following conditions deal with prevention of nuisance caused by dust:

Condition 8.2 requires that all waste processing take place indoors.

Condition 6.1 requires the licensee to control or prevent nuisance from the site activity.

Condition 6.3 requires that, prior to commencement of the Scheduled Activity, fast-action doors (or equivalent approved by the Agency) shall be installed and subsequently maintained on the entry/exit points of the Waste Recovery Buildings. The licensee is also required to ensure that all other doors be kept closed where possible.

Potential for odour nuisance may arise due to the handling of segregated organic/putrescible waste and commercial/industrial waste contaminated with organic material. The applicant states that up to a maximum of 33,600 tonnes of organic waste could be accepted annually.

Odour management at Transfer Stations, which handle putrescible waste, has previously been the cause of a significant number of odour complaints. Due to the quantity of putrescible waste to be accepted at the site and the history of odour complaints associated with Transfer Station activities, **Condition 6** of the RD requires that prior to the acceptance of putrescible waste at the facility, the Waste Recovery Buildings shall each be fitted with an odour management system. Each system shall include continuous negative air pressure with ventilated gases being subject to treatment as specified by the Agency. A report on the effectiveness of the odour management system is required to be submitted within nine months of acceptance of putrescible waste at the facility.

Condition 6 requires that a test programme be carried out within three months of commencement of operation of the abatement equipment to control odour/dust emissions from the Waste Recovery Buildings. This must establish all criteria for the control and management of the abatement equipment.

Condition 6 requires the floor of the Waste Recovery Buildings be cleared of all waste at the end of the working day. The floor of the storage bays for putrescible waste shall be washed down and cleaned at least weekly. All waste handling plant used for putrescible waste shall be washed down on a weekly basis.

Potential methanol emissions to air from the biodiesel production process shall be controlled by the use of water-cooled condensers, with the condensate being returned to the production process. **Condition 6** requires the licensee to ensure that the water cooled condensers on the biodiesel production vessels are operational at all times during which there is potential for methanol emissions.

4.2 Emissions to Sewer

A Section 52 consent was obtained from South Dublin County Council (SDCC). The RD contains the appropriately worded consent conditions and emission limit values as specified by the Sanitary Authority.

Emissions to sewer shall arise from truck washing, and from the biodiesel production process operations. The effluent from the truck wash area will pass through a silt trap and interceptor before discharging to the SDCC trade effluent sewer. The applicant states that the existing truck wash interceptor is a Class I - Full Retention Interceptor. This discharge is not expected to exceed 1.5 m³/day. The effluent from the biodiesel production process will discharge via a

separate silt trap and interceptor (Class I - Full Retention Interceptor). This discharge will not exceed 6.8 m³/day. There is no further waste water treatment on site.

Condition 3 requires the applicant to colour code the surface water and trade effluent gullies, drains and manhole covers to allow for easy identification. (Surface water – blue triangles and Trade effluent – red squares).

4.3 Storm Water Runoff

The applicant proposes to discharge the surface water runoff from the facility into the SDCC public storm water drainage network on Crag Avenue, which drains to the River Camac. Only rainwater from the site will discharge to surface water.

The River Camac is a tributary of the River Liffey. The EPA classified the River Camac as moderately to seriously polluted in 2002. All surface water drainage will pass through a continuous deflection system for screening solids, a silt trap, oil interceptor and stormwater attenuation system before discharging to the stormwater sewer. The attenuation system is to be made up of 21 rows of 15 subsurface chambers able to store 725m³ liquid, sufficient to attenuate the rainfall intensity for a 20-year return period of 2-hour duration. The discharge rate from the attenuation system will be limited to 18.6 litres/second by use of a hydrobrake. GRR propose to collect rainwater in an underground storage tank for use as raw water for truck washing and in the biodiesel washing process. Rainwater used for these washing purposes will be discharged to trade effluent sewer.

The majority of the site is already covered in hardstanding and therefore no significant increase in the volume of surface water run-off is expected. The RD requires daily visual and conductivity monitoring and quarterly monitoring of additional parameters.

There are two outdoor bunded tanks on the site used for the storage of fuel and engine oil. Approximately twenty additional storage tanks will be introduced for the biodiesel production process, these shall be bunded and sited within a suitable building as agreed by the Agency.

Condition 3 of the RD requires the applicant to carry out a risk assessment within six months of commencement of the scheduled activity of the licence to determine if a firewater retention facility is required. The findings of any such assessment shall be implemented within three months from date of notification by the Agency.

4.5 Emissions to ground/groundwater:

All waste processing will take place inside the Waste Recovery Buildings and there will be no emissions to ground/groundwater.

4.6 Wastes Generated:

The applicant states that all internal wastes arising from the operation of the facility will be recovered as much as possible, and recovered/disposed of, in conjunction with other waste arriving on site.

The hazardous waste generated on site will include 20 tonnes/annum of waste oil and 1 tonne of oil filters. This waste will be sent off site to authorised waste facilities for recovery/disposal. Waste oil shall not be used to lubricate bailer wire or other plant/equipment. **(Condition 6).**

4.7 Noise:

The applicant submitted results from a baseline noise study, carried out at the site prior to construction. The noise monitoring survey was carried out at three points on the site boundary and at the two nearest noise sensitive locations one c.300 metres to the north of the site boundary and one c.375 metres to the east of the site boundary. Daytime noise measurements (Leq) at the noise sensitive locations varied from 62 to 64 dBA. Night-time noise was recorded at 57 dBA at both locations. Noise was attributed to the adjacent industrial activity in the area, traffic (on local roads and the M50), nearby passing trains and overhead aircraft.

The principal source of noise from the facility will be from vehicle movements and the waste processing operations, i.e. sorting (including C&D waste handling), bailing and movement of waste. All waste unloading and processing will take place inside the Waste Recovery Buildings, which will provide noise attenuation.

The applicant has used BS4142 1997 'Method for rating industrial noise affecting mixed residential and industrial areas', and proposed that the specific noise from the combined

operating equipment does not (current operations under waste permit) and will not (when facility is developed) increase existing background noise level at the nearest noise sensitive locations by more than 5dB(A). Using this method the applicant applied for noise limits from the facility measured at the noise sensitive locations be set at 54dBA for the daytime period and 48dBA for night-time.

The RD requires the noise from the facility to meet the standard noise requirements (45dBA night-time and 55dBA daytime, measured at noise sensitive locations).

It is acknowledged that due to the location of the facility noise from external sources elevate the background noise levels, however the proposed facility shall not be the cause of an increase in the noise levels above the standard noise limits (55/45dBA daytime/night time). **Condition 6** requires the licensee to implement noise attenuation measures to ensure compliance with the noise limits specified in the licence. **Conditions 3** require the installation of acoustic screening of the internal C&D waste screening/sorting area to ensure compliance with the noise limits, in particular the night-time limit.

4.8 Nuisance:

The main potential for dust is from C&D waste sorting which will be carried out indoors. All waste operations will be carried out indoors and the doors shall be kept closed where possible. An atomised dust suppression system is proposed for the waste recovery buildings. Prior to the acceptance of putrescible waste at the facility, the Waste Recovery Buildings shall be fitted with a continuous negative air pressure system with ventilated gases being subject to treatment as agreed by the Agency.

Given the enclosed nature of the facility, proper management should ensure that no nuisance is caused. All putrescible waste shall be removed from the site within 48 hours of arrival and 72 hours in the case of public holidays to prevent nuisance caused by pests and vermin.

The RD requires that adequate litter control measures be applied at the facility (**Condition 6**). Off-loading will take place indoors therefore nuisance associated with litter should be kept to a minimum. All loose litter or other waste accumulated in the vicinity of the facility shall be collected and appropriately recovered or disposed of.

5. Cultural Heritage, Habitats & Protected Species

The applicant has stated that there are no known features of architectural, archaeological or historic interest within proximity of the proposed facility which is likely to be impacted on by the facility. The closest proposed National Heritage Area (pNHA) to the facility is the Grand Canal 0.3km south. The applicant states that there will be no significant environmental emissions from the facility, which could give rise to adverse effects in designated sites.

6. Waste Management, Air Quality and Water Quality Management Plans

The applicant states that a key objective of the Dublin Waste Management Plan is to reduce dependence on landfill and increase private sector involvement in waste management. The proposed development will sort, bale and recycle commercial and industrial waste and thereby divert waste material away from landfill and is thus consistent with the objectives of the plan. The activity as proposed will not contravene the Dublin Regional Air Quality Management Plan.

7. Environmental Impact Statement

I have examined and assessed the EIS and having regard to the statutory responsibilities of the EPA, I am satisfied that it complies with Article 94 and Schedule 6 of the Planning and Development Regulations 2001 (SI 600 of 2001) and Waste Management (Licensing) Regulations (SI 185 of 2000, as amended). It is noted the biodiesel production activity has been included in the additional information submitted to the Agency that forms part of the EIS.

8. Compliance with Directives/Regulations

In assessing the application regard was had for the *BREF on Waste Treatment* and the draft *BAT Guidance Note for the Waste Sectors: Transfer Activities*. The Seveso II Directive is not applicable to this site. The facility does not fall under any class specified in Annex I of the

IPPC Directive. No list I or list II substances specified in the Annex to Council Directive 80/68/EEC are to be treated on site.

9. Best Available Techniques (BAT)

I have examined and assessed the application documentation and I am satisfied that the site, technologies and techniques specified in the application and as confirmed, modified or specified in the attached Recommended Decision comply with the requirements and principles of BAT. I consider the technologies and techniques as described in the application, in this report, and in the RD, to be the most effective in achieving a high general level of protection of the environment having regard - as may be relevant - to the way the facility is located, designed, built, managed, maintained, operated and decommissioned.

10. Fit & Proper Person Assessment

Offences and Convictions

The applicant, Greyhound Recovery and Recycling Limited, has never been convicted of any relevant offence.

Technical Competence and Site Management

The two Directors of the facility are the same as for the Knockmitten Lane facility Reg. No. 95-2. Both Directors have 10 years experience in the waste management industry.

Finance provisions

The applicant has submitted audited accounts for the year ending 31st March 2004, which show a profit for the period.

The applicant submitted details of the proposed remediation, decommissioning, restoration and aftercare for the proposed facility in the event of the planned or enforced cessation of the licensed activities. Due to the scale of the activity, **Condition 12** of the RD requires the applicant to arrange for the completion, by an independent and appropriately qualified consultant, of a comprehensive and fully costed Environmental Liabilities Risk Assessment (ELRA). A report on the assessment shall be submitted to the Agency for agreement within twelve months of commencement of the Scheduled Activity of this licence. The applicant is required, to the satisfaction of the Agency, to make financial provision to cover any liabilities identified.

11. Submissions

There were two submissions made in relation to this application.

11.1 Submission from the Eastern Regional Fisheries Board (ERFB) - 31st May 2006 Mr Pat Doherty, Acting Chief Executive Office

Mr Doherty makes three points in relation to the surface water discharges from the facility in his submission.

(i) *The ERFB raises concerns about surface water from the site that will discharge to the River Camac, which is a tributary of the River Liffey, a Salmonid system. The submission states that all measures necessary should be implemented to protect the aquatic ecological integrity of this system in the first place by complete impact avoidance and as secondary approach through mitigation and remediation.*

Comment: - **Condition 8.2** of the RD requires that all waste processing and handling be carried out indoors. No process emissions shall be discharged to surface water. **Condition 6.19** of the RD requires that the licensee maintain a silt trap and an oil interceptor for the storm water discharges. **Condition 6.19** requires the drainage system to be inspected weekly, desludged as necessary and properly maintained at all times.

(ii) *The ERFB request that BAT mitigation measures be fully implemented to ensure protection of the downstream surface water system. On site housekeeping and infrastructure initiatives are required to achieve this goal. Areas of concern relate to the effective separation of wastewater streams (foul water from surface water) and the management of on-site leachate, hazardous liquids and runoff from site operations such as vehicle washing and road sweeping.*

Comment: - The foul and the surface water drainage are separate on the site. Vehicle washings will be discharged to trade effluent sewer. **Condition 6.20** of the RD requires road sweepings/washings to be collected and sent for recovery/disposal. **Condition 8.2** of the RD requires that all waste processing and handling to be carried out indoors, this will minimise the potential for leachate and hazardous liquids to enter the drainage systems. **Condition 3.18** requires tank and drum storage areas to be rendered impervious to the materials stored therein and bunded, either locally or remotely. Storm water discharge from the site will be visually inspected daily, with the conductivity monitored daily and the pH, COD, oils fats & greases, and suspended solids content monitored quarterly.

(iii) *Mr Doherty states that it would be prudent to carry out daily visual checks on all surface water discharges as well as carrying out regular analysis for standard parameters.*

Comment: - Only rainwater from the site will discharge to surface water. **Condition 6.19** requires daily visual examination of the storm water discharge from the facility and **Schedule C.2.3** specifies the required storm water monitoring.

11.2 Submission from the Health Services Executive (HSE) - 22nd December 2006
Mr Tom Prendergast, Principal Environmental Health Officer

The HSE note the location of the nearest residential properties and that the facility 'has operated largely in the absence of complaints'. Overall the HSE have no objection to the granting of a waste licence to the applicant. The submission recommends that the following seven conditions be included:

- (1.) *The applicant shall operate in full accordance with the conditions imposed by the EPA licence.*
- (2.) *The applicant shall ensure that an adequate Pest Control contract shall operate to prevent and control possible rodent, animal, insect or bird activity on site.*
- (3.) *Best Practicable Means shall be employed to minimise fugitive air blown dust and odour being emitted from the site. The developer shall have regard to odour control for neighbouring commercial properties as well as residential.*
- (4.) *The developer shall ensure that the external lighting system is designed to minimise potential pollution from glare and spillage.*
- (5.) *Clearly audible and impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of the noise levels. A traffic management system should be in place to ensure HGV manoeuvres do not create a noise nuisance at night and waiting vehicles do not create an odour problem.*
- (6.) *All mechanical plant and ventilation inlets and outlets should be sound insulated and/or fitted with sound attenuators as necessary to ensure that the noise level as expressed as LAeq over 15 minutes at 1 metre from the façade of any noise sensitive location does not exceed the background level by more than 10 dB(A) for daytime and shall not exceed the background level for evening and night time.*
- (7.) *The developer shall abide by the mitigation measures as specified in the EIS that accompanies the application in relation to air quality, noise and vibration control, and nuisance control.*

Comment: - As part of the assessment of the licence application and preparation of the RD the points above have been addressed and conditions included in the RD as deemed necessary to address the points raised. The following additional comments are provided to further address a number of points raised above:

Point 4. Light is regarded as a visual impact and as such, is a matter for the Planning Authority to regulate under the planning code. Nonetheless, considering the location of the site in an industrialised area, light spillage/glare is not expected to result in an impairment of, or an interference with amenities beyond the site boundary.

Point 5. Traffic management is considered a matter for the Planning Authority.

Point 7. The licensee is required to implement the mitigation measures as specified within the EIS and/or the requirements of the RD.

12. Charges

The proposed charges for this site, based on the predicted enforcement effort required is €20,258. The Office of Environmental Enforcement has approved this charge.

13. Recommendation

I have considered all the documentation submitted in relation to this application and recommend that the Agency grant a licence subject to the conditions set out in the attached RD and for the reasons as drafted.

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

Signed

Stuart Huskisson

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.