



**OFFICE OF
LICENSING &
GUIDANCE**

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

TO:	Directors	
FROM:	Technical Committee	- LICENSING UNIT
DATE:	5 February 2007	
RE:	Objection to Proposed Decision for TechRec Ireland Limited, Unit 51, Park West Industrial Estate, Nangor Road, Dublin 1: W0233-01	

Application Details	
Class(s) of activity:	3 rd Schedule: N/A 4 th Schedule: 3 (P) and 13
Location of activity:	Unit 51, Park West Business Park, Nangor Road, Dublin 15
Licence application received:	13/07/2006
PD issued:	18/10/2006
First party objection received:	13/11/2006
Third Party Objection received	none
Submissions on Objections received:	N/a

Facility

This report relates to a waste licence application received from TechRec Ireland Ltd., Unit 51, Park West Industrial Estate, Nangor Road, Dublin 15 to process up to 30,000 tonnes of WEEE per year and store a further 8,000 tonnes per year for subsequent offsite processing. The applicant is also applying to operate the site on a 7 day, 24 hour basis.

The site comprises a single concrete floored warehouse-style building, 3,672m² in size. According to the applicant, increasing the capacity of the facility to the proposed 38,000 tonnes will take from early 2006 until the end of 2008.

The RD permits the acceptance of 38,000tpa consisting of non-hazardous WEEE waste (10,000) and Hazardous WEEE waste (28,000t).

Consideration of the Objection

The Technical Committee (TC), comprising Bernie Murray (Chair), Yvonne Furlong and Jonathan Derham has considered all of the issues raised in the objections received and this report details the Committee's comments and recommendations, following the examination of the objections together with discussions with the inspector, Dr Tom McLoughlin, who also provided comments on the points raised.

This report considers a valid first party objection submitted by Environmental Resources Management Ireland Ltd on behalf of the applicant, TechRec Ireland Ltd.

Objections received	Date received
Environmental Resources Management Ireland Ltd on behalf of TechRec Ireland Ltd	13/11/2006

First Party Objection

A.1 Condition 2 Management of the Facility

The applicant objects to condition 2.2.2.7, which requires the establishment and maintenance of a Public Awareness and Communications Programme

The applicant objects to this condition on the grounds that *'it appears to require an active public awareness raising programme'*. TechRec propose to maintain

- an on-site file outlining the facility's environmental issues and management strategies which will be accessible to the public at all times during the facility's operation
- a site notice board in accordance with Condition 3.2.2 and
- a website (www.techrec.ie) providing details about the company, how the process works, how products are handled and contact information

TechRec do not propose to undertake any other activities in relation to this condition.

Technical Committee's Evaluation:

Condition 2.2.2.7 is a standard condition which requires the applicant to establish and maintain a system whereby members of the public can be made aware of environmental issues within the facility and the overall environmental performance of the facility. This information is supplementary to that provided for by the on-site notice board which is merely required to display where environmental information relating to the facility can be obtained. Contrary to the applicant's suggestion, Condition 2.2.2.7 does not suggest an active public awareness raising programme.

In the opinion of the TC, TechRec's website, as stated by the applicant, provides details about the company, how the process works, how products are handled and contact information. It does not provide any information pertaining to the environmental performance of the facility. The on-site file would appear to provide for Condition 2.2.2.7 to the extent that it outlines the facility's environmental issues, however, it is unclear that the existence of this file and the times during which it is available for viewing, is being relayed to the public. Provision of this information on the site notice board would facilitate this.

Recommendation: No change.

A.2 Condition 3.1 Infrastructure and Operation

The applicant objects to Condition 3.1 which requires the licensee *to 'establish all infrastructure referred to in this licence in advance of the commencement of the licensed activities...'* on the grounds that the facility has already commenced operations under a permit issued by Dublin City Council. TechRec request permission to develop a plan under the site's EMP to establish the necessary infrastructure.

Technical Committee's Evaluation

Condition 3.1 states *'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'*

Again this is a standard condition and requires that infrastructure be put in place prior to the commencement of activities under the conditions of this licence. The licensee can continue to work to the limits posed by the permit. It is not permitted to increase waste acceptance to licensable limits until the necessary infrastructure is in place. However, the TC recommend that the condition be amended to facilitate staged development of the site.

Recommendation: Amend Condition 3.1 to read

The licensee shall establish **as when required for each component**, all infrastructure referred to in this licence in advance of the commencement of the licensed activities **in that component**, or as required by the conditions of this licence.

A.3 Condition 3.3 Facility Security

The applicant objects to condition 3.3.2 which requires the installation of a CCTV system which shall be operated at all times and copies of the recording kept on site and made available to the Agency. The applicant requests clarification as to how long the CCTV tape recordings must be held and requests that they be retained for a period of 7 working days after which time they will be reused.

Technical Committee's Evaluation

Storage of CCTV tape recordings for a period of seven days is not sufficient particularly in the event of an incident requiring follow up. Given that such recordings are most likely digitally stored nowadays, a minimum retention period of one month is required.

Recommendation: Amend Condition 3.3 to read

The licensee shall install a CCTV system which will record all truck movements into and out of the facility. The CCTV system shall be operated at all times and copies of the recording kept on site **for a period of not less than one month** and made available to the Agency on request.

A.4 Condition 3.6 Waste Inspection and Quarantine Areas

Condition 3.6.3 states that *'drainage from these areas (waste inspection and quarantine areas) shall be directed to SW1-5 as shown in Drawing No 09 of the application'*.

The applicant states that the waste inspection and quarantine areas being referred to in this condition are located inside the building. These areas are protected against leaks/spills and there are no drainage points or other means of direct access to drain SW1-5, which is located outside of the building. Furthermore SW1-5 is a surface water drain and is not considered an appropriate outlet for routine discharges, which may arise in these areas. The applicant requests that this condition be deleted.

Technical Committee's Evaluation

Any drainage arising from the Waste Quarantine Area and/or the Waste Inspection Area shall be diverted for collection and safe disposal at an appropriate treatment facility off site.

Recommendation: Amend Condition 3.6.3 to read

Drainage from these areas shall be **collected and stored prior to being sent off site for disposal at an appropriate facility.**

A.5 Condition 3.8 Waste handling, ventilation and processing plant

Condition 3.8.1 requires a 20% standby capacity on a routine basis on items of plant deemed critical to the efficient and adequate processing of waste at the facility. The applicant is opposed to this condition on the grounds that 38,000 tonnes of waste per year represents the maximum throughput capacity of the plant and associated equipment. No allowance was made for additional standby or spare capacity and provision of such additional capacity would require the purchase of new plant or equipment which is not considered feasible and according to the applicant would increase the environmental footprint of the proposed activity and would trigger a licence review. The applicant is seeking clarification regarding the definitions of duty and standby capacity and requests that the reference to standby capacity be removed.

Technical Committee's Evaluation

Standby capacity may be described as emergency capacity while duty capacity may be described as operational capacity. It is the purpose of this condition to ensure that the operator provides adequate standby capacity on site for key processing and abatement equipment for the purposes of avoiding/mitigating pollution incidents in the event of standard plant breakdown (air abatement systems, handling equipment for odorous wastes).

Having regard to the nature of the activities proposed for this site, the main vulnerability in relation to the scope of this condition is in relation to abatement equipment (e.g. air abatement). The Technical Committee propose to re-word the condition to improve the clarity of purpose.

Recommendation: Amend Condition 3.8.1 as follows

Items of plant deemed critical to the efficient and **effective operation of pollution abatement systems and procedures** shall be provided on the

following basis:

- (i) 100% duty capacity;
- (ii) 20% standby capacity available on a routine basis; and
- (iii) Provision of contingency arrangements and/or back up and spares in the case of breakdown of critical equipment.

A.6 Condition 3.8.3

Condition 3.8.3 states that *'the quantity of waste to be accepted at the facility on a daily basis shall not exceed the duty capacity of the equipment at the facility'*.

According to the applicant this condition does not allow for the stockpiling of material on site. The incoming waste stream is unlikely to be received in consistent batch sizes and there may be extended periods during which there is no incoming waste. Temporary and controlled stockpiling will allow the plant to continue to operate during such periods. The applicant requests that this condition be deleted or amended to allow for the averaging of daily intake volumes.

Technical Committee's Evaluation

Agreed with minor amendment to Condition 3.8.3

Recommendation: Amend Condition 3.8.3 to read

The quantity of waste to be accepted at the facility on a daily **average** basis shall not exceed the duty capacity of the equipment at the facility. **The daily average may be calculated over any 3 consecutive month period during which the highest intake of waste was recorded.**

A.7 Condition 3.11 Silt Traps and Oil Separators

Condition 3.11 states *'The licensee shall install and maintain silt traps and oil separators at the facility to ensure that all stormwater discharges from the facility pass through a silt trap and oil separator prior to discharge...'*

The applicant is opposed to the installation of a sediment trap and oil interceptor on the grounds that all waste processing, material transfer activities and storage activities associated with the licensed activity are undertaken inside a covered building on sealed concrete floors with no internal drainage points or direct access to any surface water drainage systems. External areas are similarly covered with concrete hardstand. According to the applicant there is a low potential for contaminants to enter the surface water system during normal site operations.

In addition, surface water discharges from facilities upstream of TechRec Ireland Limited, discharge to the same drainage system which ultimately flows through the drainage system on TechRec's site (entering the site at SW1 and exiting at SW5) prior to discharging to the main drainage system. The installation of a silt trap and oil separator prior to discharge would require either:

- The isolation of the site surface water drainage and connection/by-pass of the upstream drainage system to a different point on the main drainage channel. This would require access to land neither owned nor occupied by the applicant and permission from Dublin City Council to amend the drainage system.
- The installation of a silt trap and oil separator sufficiently sized to handle surface water discharges from the licensed site and those areas up-stream discharging to the drainage system. This would also require the permission of Dublin City Council and would place undue costs on the applicant to treat and monitor emissions not from the site.

The applicant requests that this condition be deleted or amended to allow the applicant to carry out a feasibility study and risk assessment with the aim of agreeing with the Agency control measures to prevent oil contamination reaching the surface water drainage system.

Technical Committee's evaluation

All waste is received, stored and processed inside the building. Consequently stormwater will not come into contact with any waste or waste processes. Condition 3.11 recommending the installation and maintenance of silt traps and oil separators and the routing of all storm water discharges through such traps and separators is therefore perhaps excessive. On this basis the TC recommend the deletion of Condition 3.11.

Recommendation: Delete Condition 3.11
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A.8 Condition 5 Emissions

Condition 5.8 states *'Non-trade effluent waste water (e.g. firewater, accidental spillage) which is generated on-site shall not be discharged to the sewer without the prior authorisation of the Sanitary Authority'*

Condition 5.9 states *'Unless otherwise agreed by the Agency no trade effluent leachate and/or contaminated storm water shall be discharged to surface water drains and surface water courses'*.

The applicant states that these two conditions impact on the management of firewater, which may potentially be generated on site. There are no internal drains nor is there access to the foul sewer system within the building. Any excess firewater would flow outside of the building and would discharge to the external surface water and /or foul sewer drains. Presently there is no provision for the on-site containment of firewater at the site. Approx 95% of the materials handled at the facility are solids, predominantly metal and plastic in nature and the risk of firewater contamination is low.

The applicant requests that these conditions be amended to require the conduct of a Firewater Risk Assessment prior to the site proposing appropriate strategies for the management of potential firewater.

Technical Committee's evaluation

Conditions 5.8 and 5.9 must continue to prevail since ultimately it is the responsibility of the Sanitary Authority to determine the volumes and Emission Limit Values of waters discharging to sewer and the nature of firewater is such that it cannot be discharged to surface water drains and courses.

The Technical Committee recommend the insertion of a new condition requiring the applicant to carry out a Risk Assessment to determine if the activity should have a firewater retention facility. This Assessment will also consider whether it is appropriate to discharge Firewater directly to sewer (subject to consultation with Local Authority) or whether provision for collection and tankering to an appropriate off-site treatment facility is necessary. The Technical Committee proposes the insertion of Condition 5.11 relating to firewater retention.

Recommendation: Insert Condition 5.11 as follows:

The licensee shall carry out a risk assessment to determine if the activity should have a firewater retention facility. The licensee shall submit the assessment and a report to the Agency on the findings and recommendations of the assessment within 6 months from the date of grant of this licence. Any recommendations arising from this assessment shall be implemented with the agreement of the Agency.

A.9 Condition 8 Waste Acceptance and Characterisation Procedures

Condition 8.10.5 states ‘..There shall be no casual public access to the facility.’

The applicant proposes to accept domestic WEEE such as personal computers from the public should such waste present itself at the facility. The applicant was not proposing to advertise this service but would provide it if and when required.

The applicant requests that reference to the general public within Condition 8.10.5 be deleted.

Technical Committee’s evaluation

Licence condition 8.10.1 states that *‘waste shall only be accepted at the facility from Local Authority waste collection or transport vehicles or holders of waste permits unless exempted or excluded, issued under the Waste management Acts 1996 to 2005’*.

In accordance with Article 22 of the Waste Collection Permit Regulations S.I. No 402 of 2001, private individuals transporting their own household WEEE to the facility would not be required to have a collection permit and thus are exempted persons for purposes of Condition 8.10.1. However, casual access to the facility is not permissible. Therefore, private individuals delivering WEEE to the site shall only deliver to a dedicated reception area. The delivery of WEEE directly to the facility by members of the public is an additional service for which the applicant must accept responsibility and implement and comply with any Health and Safety obligation arising therefrom.

Recommendation: Condition 8.10.5 shall be amended to read

Waste shall be accepted at the facility only from known customers or new customers subject to initial waste profiling and waste characterisation off-site. The written records of this off-site waste profiling and characterisation shall be retained by the licensee for all active customers and for a two year period following termination of licensee/customer agreements. There shall be no casual public access to the facility.

Household WEEE from private individuals shall only be accepted at a dedicated reception area within the facility.

A.10 Condition 9 Accident Prevention and Emergency response

Condition 9.4.1 requires that any breakdown of equipment or any other occurrence resulting in the closure of the transfer station building shall require the diversion of any waste arriving at or collected at the facility to be transferred directly to appropriate landfill sites or any other appropriate facility, until such time as the transfer station building is returned to fully operational status.

The applicant objects to this condition on the basis that it is intended for facilities which accept putrescible wastes and does not believe it is valid for a site which accepts only inert solid wastes. According to the applicant the temporary stockpiling of WEEE on the site during any necessary repair works would not interfere with the work programme or with the amenity of the site or the surrounding area. In addition, the applicant objects to the description of the facility in the condition as a transfer station and states it would be more appropriate to refer to it as a recycling facility.

The applicant requests that this condition be deleted.

Technical Committee's evaluation

The TC is in agreement with the applicant. This condition was originally introduced to prevent the build up of excessive putrescible wastes, hazardous waste and other wastes of low value. WEEE constitutes a high value non-putrescible waste and closure of the facility for any reason will not pose a risk of nuisance in terms of odour generation or attraction of vermin. Therefore transfer of WEEE to landfill is unnecessary. The proposed amendment to Condition 3.8.3 above will serve to control any excessive stockpiling.

Recommendation: Delete Condition 9.4.1

A.11 Schedule B Emissions to Air

Schedule B.1 requires dust deposition limits to be measured at monitoring points A1-1 and A2-1 as identified on drawing no 20 of the application. According to the applicant these monitoring points are not suitable for the measurement of dust deposition levels since they are located inside final exit/vent pipes from the respective stacks.

The applicant requests that either:

- The monitoring technique and associated threshold be amended to allow for point source monitoring of particulates from A1-1 and A2-1; or,
- The required monitoring locations be amended to allow for dust deposition monitoring.

Technical Committee's evaluation

The TC is of the view that it is more appropriate to monitor dust deposition limits from the stacks themselves. Since this activity is a WEEE recycling facility, emissions

will be characterised by particulates and metals and appropriate ELVs are taken from the metals and plastics BAT notes, and the waste treatment BAT note. Two amendments to the Schedules are proposed,

- The table in Schedule B1 to be replaced and
- associated monitoring table to be included in Schedule C.1.2

Recommendation:

B.1 Emissions to Air

Emission Point(s) Reference Number: A1-1, A2-1 (or as may be amended under Condition 6.6).

Location: Measured at the monitoring points shown on Drawing No. 20 of the application

Parameter	Emission Limit Value (mg/Nm ³)
Cr	1
Ni	5
Particulates	50

C.1.2 Monitoring of Emissions to Air

Delete ‘refer to condition 6.14 above’ and insert the following table:

Emission Point(s): A1-1 & A2-1 (Drawing 20 of the IPPC Application)

Parameter	Monitoring Frequency	Method
Cr	Biannually	Standard method
Ni	Biannually	Standard method
Particulates	Biannually	Standard method

A.12 Schedule B.2 Emissions to Stormwater

Schedule B.2 requires surface water monitoring to be carried out at SW1 and SW5. SW1 is located upstream of the facility and receives surface water from off-site locations. The applicant is concerned that they will be held responsible for ensuring the quality of the incoming surface water as set out in Schedule B.2.

The applicant requests that the requirement to comply with the stated water quality parameters at SW1 be deleted from this Schedule or an amendment be made to the condition, which reflects the fact that it would be the difference in levels that would be an indication of levels emitted by the site.

Technical Committee’s evaluation

The applicant is not required to monitor the merged stream at SW1, rather he is required to monitor the discharge emanating from the site and discharging at SW1. This is not a process emission, the only emission to SW1 is storm water and run-off

from non-process areas. ELV's are thus not strictly necessary. The TC recommends the deletion of Table B2

Recommendation: Delete Table B2 under Schedule B and insert the following text.

B.2 Emissions to Storm Water

There shall be no emissions to water of environmental significance.

A.13 Schedule C.2.1 Control of Emissions to Water

Schedule C.2.1 relates to the monitoring of an oil interceptor/silt trap to which the applicant objects for reasons outlined in Objection A.7, Condition 3.11, Silt Traps and Oil Separators. The applicant requests that this Schedule be deleted.

Technical Committee's evaluation

Accepted. See Technical Committee's response to objection A.7

Recommendation: Delete table in Schedule C.2.1 Control of Emissions to Water. and replace with the following text

C.2.1 Control of Emissions to Water

There shall be no emissions to water of environmental significance.

A.14 Schedule C.2.3 Monitoring of Stormwater Emissions

Schedule C.2.3 sets out the frequency with which surface water monitoring should be carried out at SW1 and SW5. For reasons set out in Objection A.12 Schedule B2 Emissions to Stormwater, the applicant requests that reference to SW1 be removed from this Schedule or that the Schedule be amended to reflect the fact that it is the difference in Emissions between SW1 and SW5 that reflects emissions from the site.

Technical Committee's evaluation

Under Schedule C.2.3 'Monitoring of Storm Water Emissions', SW1 and SW5 should be described as monitoring points. The only emissions to SW1 and SW5 are storm water emissions and run-off from non-process areas. The TC recommend continued monitoring of SW1-5 as a matter of good housekeeping to ensure there is no unacceptable run-off from the site. Accordingly the TC recommend that the title of the table under Schedule C.2.3 be altered from 'Emission Point Reference No' to 'Monitoring Point Reference No'.

Recommendation: Amend Schedule C.2.3 'Monitoring of Storm Water Emissions' to read as follows

C.2.3 Monitoring of Storm Water Emissions

Monitoring Point Reference No.: SW1 and SW5 as outlined on Drawing No 20 of the application.

PARAMETER ^{Note 1, Note 2}	SURFACE WATER Monitoring Frequency
Mineral Oils	Quarterly
Total Suspended Solids	Quarterly
COD	Quarterly
Metals / non metals ^{Note 3}	Annually
List I/II organic substances (Screen) ^{Note 4}	Annually
Mercury	Annually
Visual	Weekly

Note 1: All the analysis shall be carried out by a competent laboratory using standard and internationally accepted procedures.
Note 2: Where there is evident gross contamination, additional samples should be analysed and the full suite of parameters shown tested.
Note 3: Metals and elements to be analysed by AA/ICP should include as a minimum: boron, cadmium, calcium, chromium (total), copper, iron, lead, magnesium, manganese, nickel, potassium, sodium and zinc.
Note 4: Samples screened for the presence of organic compounds using Gas Chromatography / Mass Spectrometry (GC/MS) or other appropriate techniques and using the list I/II Substances from EU Directive 76/464/EEC and 80/68/EEC as a guideline. Recommended analytical techniques include: volatiles (US Environmental Protection Agency method 524 or equivalent), semi-volatiles (USEPA method 525 or equivalent, and pesticides (USEPA method 608 or equivalent).

A.15 Schedule C.2.1 Control of Emissions to Water and Schedule C.2.3 Monitoring of Storm Water Emissions.

The applicant is of the view that these conditions overlap since the only emissions to Water are emissions through the storm-water drainage system. The applicant requests that the Agency clarify if there is an overlap in these Schedules and if so amend appropriately.

Technical Committee's evaluation

These concerns have been addressed in objections A13 and A14 above.

Recommendation

See Recommendation under objections A13 and A14.

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

Bernie Murray
for and on behalf of the Technical Committee