



Environmental Protection Agency
An Ghníomhaireacht um Chaomhú Comhshaoil

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Mr Michael Geary,
Greenstar Ltd,
Floor 3, Burton Court,
Burton Hall Road,
Sandyford,
Dublin 18

File Copy

Cc: Mr John Mernagh, Facilities Manager, South East Recycling Co. Ltd, Carrigbawn,
Pembrokestown, Co. Wexford

13th March 2007

Re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management
(Licensing) Regulations – Waste Reg No: W0111-03

Dear Mr Geary,

I am to refer to the above referenced application for a waste licence relating to a facility at **South East Recycling Company Ltd, Carrigbawn, Pembrokestown, Co. Wexford**. 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

1. Indicate the location of the activity on an OS Discovery Series Map, highlighting any rivers, lakes, wells, etc.
2. Revise Drawing 1 "Site layout, storm water drainage and monitoring points" to show the following:
 - i. Staff and visitor parking areas;
 - ii. Any embankments that have been installed along the site boundaries;
 - iii. Groundwater monitoring points;
 - iv. Any outdoor waste storage areas, e.g. Construction & demolition waste, glass, etc;
 - v. Silt traps & all oil interceptors.



3. Article 12(1)(e) of your application states that the facility is a non-hazardous waste materials recovery and transfer operation. Clarify the inclusion of the following hazardous waste categories as detailed in Section 2.2 of the AER for 2005:
 - i. EWC 15 01 10 (Packaging waste contained residues of or contaminated by dangerous substances)
 - ii. EWC 17 04 09 (Metal waste contaminated with dangerous substances);
 - iii. EWC 17 04 10 (Cables containing oil, coal tar and other dangerous substances).
4. Gypsum is listed in the Environmental Management Plan 2006 as a C&D waste material accepted at the site, however there is no reference to gypsum as part of the list of individual waste streams listed in the AER. Specify, clearly, by reference to the relevant European Waste Catalogue codes as presented by Commission Decision 2000/532/EC of 3 May 2000, a full list of the quantity and nature of wastes which will be treated, recovered or disposed of at the facility.
5. Table 3.1 of the AER for 2005 states that 70 tonnes of scrap metal was accepted at the facility, but 728 tonnes of scrap metal was recycled or recovered. Clarify if this figure is correct.
6. Specify if the destinations for C&D waste listed in Table 3.1 of the AER for 2005 are still the same or if these have changed in the interim.
7. Supply estimates of proposed increase in energy and fuel usage should the expansion of the facility be approved.
8. Supply details of how increased fuel usage will be managed on site. Will there be an increase in the amounts of diesel and other oils stored on site? Indicate current bunding provisions on site for fuel storage and locations of current/proposed spill kits on the site layout plan.
9. Please confirm if the wood chip facility referred to on drawings 1, 2 & 4 is still on site. If not, then the drawings should be amended accordingly.
10. Submit a floor plan showing the layout of the waste transfer building, to show recycling areas, segregation transfer areas, waste inspection areas, quarantine areas, etc.
11. Indicate how the proposed review will alter the existing weighbridge arrangements, as referred to in Article 12(1)(i) of your application form.
12. Clarify if the staff referred to in Section 12.0 of the AER 2005, denotes the total staff compliment for the facility.
13. Submit details of estimated volumes and rates of surface water run-off discharged to the drain and also supply information regarding the nature of the drain, i.e. is this a dry drain during the summer, where does the drain flow to, etc.



14. Clarify if surface water monitoring point SW1 and SW Outfall, referred to in the surface water monitoring results in Article 12(1)(k) of the application are the same monitoring points. If these points are different, submit a revised drawing showing all surface water monitoring points.
15. Provide proposals for the control of dust emissions in light of the proposed increase in waste tonnage from 13,500 tpa to 50,000 tpa.
16. Provide proposals for control of odour emissions in light of the proposed increase in waste tonnage.
17. Estimate volumes of waste oils generated on site at present and also expected volumes should the expansion take place. How and where are these oils stored prior to collection for transport off-site?
18. Submit details of all current methods for off-site treatment or disposal of wastes.
19. Describe the existing measures, including emergency procedures, to prevent unauthorised or unexpected emissions and minimise the impact on the environment of any such emission.
20. Describe the proposed measures for the closure, restoration, remediation or aftercare of the facility, after the cessation of the activities in question.
21. Please confirm if Wexford County Council Planning Department require an E.I.S. to be carried out for this facility, as referred to in Section 7.0 of the AER for 2005.
22. Submit details of site security including gates, fencing, CCTV systems, etc in operation at the facility.
23. "BAT Guidance Notes for Waste Sector: Transfer Activities" (Draft, 2003) states that transfer stations handling household waste must carry out all waste processing activities in an entirely enclosed building using negative air pressure. During our site visit on 12th March 2007, the EPA was told that **no** development works will be carried out at the facility in light of fact that Greenstar will be vacating the site by September 2010. Please confirm this in writing.
24. Under Part I of the Second Schedule of the Waste Management Licensing Regulations (2004), S.I. No. 395 of 2004, the fee for a review or surrender of a waste licence for the disposal of waste (other than hazardous waste) at a facility (other than a landfill facility) where the annual intake is less than 25,000 tonnes is €6,000. The fee for a review or surrender of a waste licence for recovery of waste is €6,000. Therefore the appropriate fee for this application is €12,000. The amount received by the EPA was only €10,000. Please submit the outstanding €2,000. I wish to point out that your application is not valid until the full fee is received by the Agency.

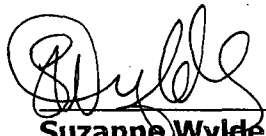
Your reply to this notice should include a revised non-technical summary, which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

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 two copies **within six weeks** of the date of this notice. In addition submit sixteen copies of the requested information to the Agency in electronic searchable PDF format on CD-ROM. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is **W0111-03**. Please direct all correspondence in relation to this matter to *Catherine O'Keeffe, Licensing Unit, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

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Suzanne Wyld
Inspector
Office of Licensing & Guidance

