

Ms. Bernie Murray,  
Office of Licensing & Guidance,  
Environmental Protection Agency,  
Headquarters PO Box 3000,  
Johnstown Castle Estate,  
Co. Wexford.

22<sup>nd</sup> March 2007

RE: Application for the Review of Waste Licence Ref. No. W0111-01  
South East Recycling Co. Ltd, Carrigbawn, Pembrokestown, Co. Wexford

Dear Ms. Murray,

On behalf of South East Recycling Co. Ltd (SERC), I enclose one original and two hard copies of the response to the Article 14(2)(b)(ii) Further Information Request dated 13<sup>th</sup> March 2007. I also enclose two CD-ROM discs containing the application in searchable pdf format. The content of the electronic files is a true copy of the original application form.

The response includes: -

- This cover letter,
- Responses to each of the questions raised by the Agency, including relevant Drawings and Appendices,
- Application Fee €2,000.

If you have any queries, please call me.

Yours sincerely,

  
Jim O' Callaghan

0604819/JOC/PS

Encs.

c.c. Mr. Malcolm Dowling, Greenstar Ltd.,  
Mr. John Mernagh, South East Recycling Co. Ltd.,

Bank of Ireland



90-27-68

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Date 22/03/07

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*[Signature]*

*James D Callaghan*

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## **O' Callaghan Moran & Associates**

**Article 14(2)(b)(ii) Further Information**

**Particulars and Evidence For**

**South East Recycling Co. Ltd**

**Waste Licence Review No. W0111-03**

**Article 12 Compliance**

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**Article 14(2)(b)(ii) Further Information**  
**Particulars and Evidence For**  
**South East Recycling Co. Ltd**  
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**Article 12 Compliance**

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**Prepared For: -**

South East Recycling Co. Ltd.,  
Carrigbawn,  
Pembrokestown,  
Co. Wexford.

**Prepared By: -**

O' Callaghan Moran & Associates,  
Granary House,  
Rutland Street,  
Cork.

**23<sup>rd</sup> March 2007**

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## 1. INTRODUCTION

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This report presents the response by South East Recycling Company Ltd (SERC) to the Notice issued in accordance with Article 14(2)(b)(ii) of the Waste Management Licensing Regulations, in relation to the application for a review of Waste Licence, Application Register No. W0111-03, for a non-hazardous waste transfer facility at Carrigbawn, Pembrokestown, County Wexford.

Section 2 contains the responses to the Agency's requests. For ease of interpretation each of the requests are presented in italics followed by SERC's response.

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## 2. ARTICLE 12 COMPLIANCE REQUIREMENTS

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1. *Indicate the location of the activity on an OS Discovery Series Map, highlighting any rivers, lakes, wells, etc.*

An OS 1:50,000 Discovery Series map (Figure 1) is included in Appendix 1. With the exception of the on-site groundwater monitoring wells there are no other wells on record within 1 km of the facility.

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.*

Revised Drawings No’s 1 and 4, which show the requested details are included in Appendix 1.

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).*

The facility is a non-hazardous waste materials recovery facility. Hazardous wastes are not accepted at the facility.

EWC ‘15 01’ and EWC ‘17 04’ are listed in the AER which does imply that 15 01 10, 17 04 09 and 17 04 10 are accepted. However, this is not the case. Only the non-hazardous codes on these lists are accepted at the facility. The full list of EWC codes proposed is shown in response to request No. 4.

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.*

Since the AER was submitted the facility has accepted gypsum as part of the C&D waste stream. The facility has approval from the Agency (25<sup>th</sup> May 2005) to send Gypsum recovered from the waste stream to Gypsum Recycling Ireland Ltd, 44A Moyle Road, Dublin Industrial Estate, Glasnevin, Co. Dublin (WMP 2004/3).

The updated EWC list is shown below. In addition to the codes shown in the AER the list also includes a code for mixed MSW (20-03-01) and discarded electrical equipment (20-01-36). It is not intended to accept WEEE in the near future, but the facility would like the flexibility to provide this service should the demand arise. Any proposals for the acceptance, storage and handling of WEEE would be submitted to the Agency prior to acceptance of WEEE.

Proposed EWC Codes List:

**15 01 packaging (including separately collected municipal packaging waste)**

- 15 01 01 paper and cardboard packaging
- 15 01 02 plastic packaging
- 15 01 03 wooden packaging
- 15 01 04 metallic packaging
- 15 01 05 composite packaging
- 15 01 06 mixed packaging
- 15 01 07 glass packaging
- 15 01 09 textile packaging

**17 04 metals (including their alloys)**

- 17 04 01 copper, bronze, brass
- 17 04 02 aluminium
- 17 04 03 lead
- 17 04 04 zinc
- 17 04 05 iron and steel
- 17 04 06 tin
- 17 04 07 mixed metals

**17 01 concrete, bricks, tiles and ceramics**

- 17 01 07 mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06



**17 05 soil (including excavated soil from contaminated sites), stones and dredging spoil**

17 05 04 soil and stones other than those mentioned in 17 05 03

**17 08 gypsum-based construction material**

17 08 02 gypsum-based construction materials other than those mentioned in 17 08 01

**19 12 wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**

19 12 09 minerals (for example sand, stones)

19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11

**20 01 separately collected fractions (except 15 01)**

20 01 01 paper and cardboard

20 01 36 discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

20 01 38 wood other than that mentioned in 20 01 37

20 01 40 metals

**20 03 other municipal wastes**

20 03 01 mixed municipal waste

20 03 07 bulky waste

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It is not possible to provide accurate estimates for the quantity of wastes that will be handled according to EWC code. Actual quantities will be provided in future AERs. The waste categories and quantities are provided in the table below.

**Waste Categories and Quantities**

<b>WASTE TYPE</b>	<b>MAXIMUM (TONNES PER ANNUM) <sup>(Note 1)</sup></b>
Household waste	10,000
Commercial	20,000
Construction and Demolition	10,000
Industrial Non-Hazardous	10,000
<b>TOTAL</b>	<b>50,000</b>

**Note 1:** The quantities of the different categories referred to in this table may be amended with the agreement of the Agency provided that the total quantity of waste specified is not exceeded.

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.*

This figure is correct. The total amount recycled includes metals recovered from the mixed waste streams.

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.*

C&D waste is not now sent to the outlets in Table 3.1. The only destination for C&D waste at present is CRS Ltd, Montague, Gorey, Co. Wexford (Waste Permit No. WP/05/24). This facility was approved by the Agency on the 27<sup>th</sup> February 2006.

7. *Supply estimates of proposed increase in energy and fuel usage should the expansion of the facility be approved.*

It is not expected that there will be a significant increase in energy and fuel use due to the proposed increase in waste volumes. No additional plant items will be provided, as the existing plant is considered to be operating below capacity and therefore inefficiently. The review is seeking to increase the operational hours from 58.5 per week to 64.5 per week i.e. 6 hours per week extra for plant and equipment to be operational. It is therefore likely that the increase in fuel and energy will be 10%. As stated in the application actual energy consumption figures will be reported in future AERs.

Estimate of Total Annual Energy & Fuel use. Based on 10% increase on 2005 figures (See Section 6 AER 2005).

- Approximately 27,754 litres of marked fuel oil,
- Approximately 21,780 litres of unmarked fuel oil,
- €10,450 of electricity,
- 990 litres of hydraulic oil,
- 660 litres of engine oil,
- 55 litres of transmission oil,
- 33 litres of gear oil,
- 180 litres of anti-freeze.

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.*

It is estimated that fuel use will increase by approximately 10%. It is not proposed to change the existing storage arrangements for fuel and oils as there is sufficient capacity to store any additional volumes.

Fuel is stored in a 5,000 gallon tank in a bund close to the waste transfer building. The bund meets the criteria set in Condition 4.11.5 of the existing licence and was last tested (passed) in December 2004. The bund will be tested again in accordance with the existing licence prior to December 2007.

There is one spill kit located on-site, at the location shown on Drawing No. 1. A second spill kit will be provided and maintained at the location shown on Drawing No. 1.

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.*

The wood chip building and plant items are still at the facility, although they are not operational. The drawings therefore do not require amendment.

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.*

Drawing No. 6 Floor Plan in Appendix 1 shows a floor plan for the facility.

11. *Indicate how the proposed review will alter the existing weighbridge arrangements, as referred to in Article 12(1)(i) of your application form.*

There was a typographical error in the original application. The sentence should read 'The proposed review will **not** alter the existing weighbridge arrangements'.

12. Clarify if the staff referred to in Section 12.0 of the AER 2005, denotes the total staff compliment for the facility.

The table below shows the management structure for the facility.

<b>Name</b>	<b>Position</b>	<b>Responsibilities</b>	<b>Experience</b>	<b>Replacement</b>
Martin Morrissey	Director	Overall management of site and companies group	12 years experience	Michael Murphy
Michael Murphy	Director	Group Financial Controller Accountant	8 years experience	Martin Morrissey
Denis Mullally	General Manager	Overall management of site and business	17 years experience	Martin Morrissey or Michael Murphy
John Mernagh	Facilities Manager	Management of site operations	19 years experience FAS Waste Management Training programme	Denis Mullally
Jim Corcoran	Systems and Operations	Group Waste Management Reports and Systems	5 years experience	Eileen Hayes or Denis Mullally
Eileen Hayes	Office Administration	Administration and Accounts	10 years experience	Margret Murphy
Margret Murphy	Office Administration	Accounts	3 years experience	Eileen Hayes
Michael Taylor	Transfer Station Foreman	Management of operations of transfer station	8 years experience	Ivan Cummins
Ivan Cummins	Site Foreman	General supervision of staff and Recycling Operations	22 years experience	Denis Mullally or Michael Taylor

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.

The drain serving the site is directed to a Wexford County Council surface water attenuation pond at Killeens. This pond discharges at a controlled rate to the Horse River which flows through Wexford town and discharges to Wexford Harbour.

The drain is not generally dry in summer, but can temporarily dry-up in drought conditions. Surface water discharges from the facility are rainfall dependant, as is the flow in the drain. The estimated daily discharge to the drain is calculated using 30 year average rainfall data from the Met Eireann synoptic station at Rosslare in Wexford.

Between 1961 and 1990 the average yearly rainfall was 877.1 mm. The surface area of the site served by the surface water drainage system is 5980 m<sup>2</sup>. The yearly discharge is therefore 5244 m<sup>3</sup> which is a daily average of 14 m<sup>3</sup>.

*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.*

SW1 and Outfall are the same location.

*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.*

Proposals for the control of dusts were included in Section 12 (1) k of the original application and were based on the proposed increase in waste inputs. The facility is currently accepting 39,000 tonnes of waste annually. The dust monitoring results for 2005 and 2006 confirm that dust emissions from the facility are not a cause of concern. Dust emissions have not traditionally been an issue at the facility.

As it is not proposed to change the existing site activities or plant items there will be no new sources of dust. There is the potential for increased dust emissions due to increased vehicle movements and waste processing, but these are not considered likely to result in nuisance or exceedance in deposition limits. The abatement measures used to control dust include a sprinkler system to dampen down wastes on portions of the transfer building, regular yard and road sweeping, damping down in dry weather conditions and internal processing of wastes.

It is not proposed to alter the existing dust control measures, as they are working effectively.

*16. Provide proposals for control of odour emissions in light of the proposed increase in waste tonnage.*

Details of the odour control measures were included in Section 12 (1) k of the original application and were based on the proposed increases in tonnages. The current materials recovery and transfer operations, which include the acceptance of waste with an organic content, are not a significant source of odour nuisance. At present approximately 39,000 tonnes of waste are accepted annually.

Existing odour control measures include a sprinkler system, which sprays a masking agent in the waste processing building, the quick processing and removal of putrescible wastes off-site and floor cleaning of areas used to handle putrescible wastes. The facility removes all putrescible wastes within twenty-four hours of its arrival on-site except on weekends and on Bank Holidays as the facility is not authorised to operate. This means that the majority (>80%) of putrescible waste is removed on the same day it is received.

The odour control measures currently employed at the facility are operating effectively and it is considered that they are adequate to control odour emissions in light of the proposed increase in tonnages.

*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?*

The proposed changes to facility operations will not result in any changes to the existing arrangement for off-site treatment and disposal of wastes, as stated in Section 12 (1) (o) of the original application.

The facility generates small amounts of waste oils from the servicing of on-site plant items. All transport vehicles are serviced off-site. The facility has a 1,000 litre bunded storage tank specifically designed to store waste oils. It is estimated that in 2006 200 litres of waste oils were generated and remain in the tank. It is not expected that the proposed review will alter the volume of waste oils generated on-site. It was not necessary to have any waste oil removed from the facility in 2006 and none has been removed in 2007. It is estimated that the existing tank currently has capacity of 800 litres. The location of the waste oil storage tank is shown on Drawing No. 1.

*18. Submit details of all current methods for off-site treatment or disposal of wastes.*

The proposed changes to facility operations will not result in any changes to the existing arrangement for off-site treatment and disposal of wastes, as stated in Section 12(1) (o) of the original application. The facility sends waste for further processing or disposal to authorised waste facilities, which have been approved by the Agency.

*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.*

SERC has prepared an Emergency Response Procedure for the facility in compliance with Condition 10.1 of the current licence submitted to the Agency. A copy of the procedure is included in Appendix 2.

All fuel/oil storage tanks are bunded in accordance with Condition 4.11.5 of the existing licence. There is currently one spill kit located on-site at the location shown on Drawing No. 1. It is proposed to place a second spill kit at the facility.

The facility is paved and run-off is directed to oil interceptors prior to discharge to stream. The facility submitted a proposal to the Agency (15<sup>th</sup> February 2007) for the re-direction of the surface water drainage system to the foul sewer in the case of a fire or spill at the facility. Approval for discharge of firewater to the foul sewer has been granted by Wexford County Council. The proposal forms part of the fire-water retention assessment for the facility and involves valves being placed on the surface water drain prior to discharge and for contaminated water to be directed to the foul sewer. Approval from the Agency is pending.

*20. Describe the proposed measures for the closure, restoration, remediation or aftercare of the facility, after the cessation of the activities in question.*

The original application (Section 12(1)(q)) stated that the proposed changes to the facility activities will not impact on the measures for the closure, remediation and aftercare of the facility as regulated by Condition 8 of the current licence. The facility submitted a Decommissioning Plan to the Agency in 2004, a copy of which is included in Appendix 3. In the event of the cessation of activities and an application to surrender the licence the precise scope of the closure and decommissioning plan will be agreed with the Agency.

*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.*

Wexford County Council does not require an EIS. A copy of the letter is included in Appendix 4.

22. *Submit details of site security including gates, fencing, CCTV systems, etc in operation at the facility.*

The perimeter on the northwestern and northern boundary is natural ditches and barbed wire fencing, the southern boundary is made up of natural ditches, a man made earth mound and barbed wire fencing. The entrance area is protected by 2.5 metre high palisade fencing and gates as well as natural ditches at the car park boundary. The gate is locked outside operational hours.

Although the existing licence does not require it, the facility has a CCTV system installed on-site with 24 hour recording on all cameras.

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 12<sup>th</sup> 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.*

It is Greenstar's intention to cease activities at the site by September 2010 and relocate waste activities to a new MRF in the south-east region. Greenstar intends to apply for planning permission and a Waste Licence for the new facility in 2007.

24. *Under Part I of the Second Schedule of the Waste Management Licensing Regulation (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. 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.*

A cheque for €2,000 is enclosed.



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### 3. NON TECHNICAL SUMMARY

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#### **Introduction**

South East Recycling Co. Ltd (SERC), Carrigbawn, Pembrokestown, County Wexford is applying to the Environmental Protection Agency (Agency) for a review of the Waste Licence for its Materials Recovery and Transfer Station at Pembrokestown, Co. Wexford (W0111-01).

The objectives of the review are: -

- To increase the overall limit on annual waste inputs from the 13,500 tonnes specified in Schedule A of the licence to 50,000 tonnes per annum.
- To amend the waste types specified in Schedule G of the licence to include non-hazardous Household Wastes.
- To amend the existing hours of operation (8.00am - 6.30pm Monday to Friday and 8.00am - 2.00pm Saturday) and waste acceptance (8:00am - 5.30pm Monday to Friday and 8.00a.m. - 1.00p.m. on Saturdays) to 7.30am - 7.00pm Monday to Friday and 7.30am - 2.30pm Saturday. It also proposed to accept waste and operate from 7.30am - 5.00pm on the six Saturdays following Bank Holiday weekends.
- To amend the licensed activities to include Class 12 of the Third Schedule - Waste Disposal Activities of the Waste Management Acts 1996 to 2003.

#### **Nature of the Facility**

The facility is non-hazardous waste materials recovery and the transfer operation. Waste materials are processed and treated on-site to recover wastes that are suitable for recovery and to minimise the quantity of treated waste disposed to residual landfill.

#### **Classes of Activity**

The relevant activities as per the Third and Fourth Schedules of the Waste Management Acts 1996 - 2003 will be as follows: -

#### **Third Schedule – Waste Disposal Activities**

##### **Class 11**

*“Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule”.*

Residual Household and Commercial/Industrial wastes are mixed prior to submission to off-site licensed landfills.

#### Class 12

“Repackaging prior to submission to any activity referred to in the preceding paragraph of this Schedule”.

Residual waste at the site is baled and compacted prior to submission to off-site licensed landfill facilities.

#### Class 13

*“Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced”.*

Residual wastes are stored prior to submission to off-site licensed landfills.

### **Fourth Schedule – Waste Recovery Activities**

#### Class 2

*“Recycling or reclamation of organic substances which are not used as solvents, (including composting and other biological processes)”.*

Wood and green waste is shredded, plastics, paper and cardboard are recovered for off-site recycling. This is the principal waste activity undertaken at the site.

#### Class 3

*“Recycling or reclamation of metals and metal compounds”.*

Metals and wire, which are recovered from the incoming waste, and aluminium cans delivered to the site separately, are stored on-site pending removal to off-site recycling facilities.

#### Class 4

*“Recycling or reclamation of other inorganic materials”.*

Inorganic materials comprising inert construction and demolition waste and glass are recovered from the incoming waste and stored pending removal off-site for recycling.

#### Class 13

*“Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced”.*

Wastes are stored prior to submission to off-site permitted/licensed recycling and reclamation facilities.

## Quantity and Nature of the Waste to be Recovered or Disposed

The quantity and nature of the wastes are presented in Table 1.

**Table 1: Waste Categories and Quantities**

WASTE TYPE	MAXIMUM (TONNES PER ANNUM) <sup>(Note 1)</sup>
Household waste	10,000
Commercial	20,000
Construction and Demolition	10,000
Industrial Non-Hazardous	10,000
<b>TOTAL</b>	<b>50,000</b>

**Note 1:** The quantities of the different categories referred to in this table may be amended with the agreement of the Agency provided that the total quantity of waste specified is not exceeded.

## Raw and Ancillary Materials, Substances, Preparations used on the Site

Details on the raw and ancillary materials, substances, preparations, fuels and energy that were utilised at the facility in 2006 are presented in Table 2.

**Table 2: Estimate of Resources Used On-Site 2006**

Resources	Quantities
Diesel	24125litres
Hydraulic and Engine Oil	1500litres
Transmission oil	48litres
Gear oil	20litres
Road Diesel	197,245litres
Electricity	65833 units
Antifreeze	105litres

## Plant, Methods, Processes and Operating Procedures

The proposed increases in the waste volumes and type accepted for processing will not result in any changes to the current plant, methods, processes and operating procedures that are currently employed or envisaged under the current licence conditions.

## Information Related to Section 40(4) (a) to (d) of the Waste Management Act, 1996 to 2003

The emissions will not result in the contravention of any relevant standard or emission limit prescribed under enactment.

The site activities are based on best management practice and take into consideration the Draft BAT Guidance Note for the Waste Sector: Waste Transfer Activities published by the EPA. The facility operations, when carried out in accordance with licence conditions, will not cause environmental pollution.

It is not proposed to amend the current management structure at the facility. Facility personnel with responsibility for the management of the waste activities will complete the FAS waste management training course. Details of the levels of training and experience of the current site management are presented in the AER for 2005, which is in Appendix 3 of this application.

SERC were prosecuted in Wexford District Court on 6<sup>th</sup> December 2004 on charges of sending in excess of 300 tonnes of waste for disposal to Northern Ireland and sending construction and demolition waste to a quarry at Castlebridge, County Wexford.

On the 10<sup>th</sup> April 2006, SERC pleaded guilty to four charges in Wexford District Court: exceeding the annual waste limit for 2005; accepting municipal waste that was not authorised; transferring waste to an unapproved facility and operating outside the specified operational hours.

SERC is a wholly owned subsidiary of Greenstar Ltd. The relevant section of the profit and loss account for Greenstar for the year ending 2004 and 2005 is included in Appendix 1 of this application.

Greenstar have financial provisions in place to address any environmental liability including insurance cover to the sum of €6,350,000 for any one occurrence.

## **Source, Location Nature, Composition, Quantity, Level and Rate of Emissions**

### *Surface Water*

The surface water drainage from the paved and roof area flows through an oil interceptor located to the west of the main building, with an outfall into an open drain. The drain serving the site is directed to a Wexford County Council surface water attenuation pond at Killeens. This pond discharges at a controlled rate to the Horse River which flows through Wexford town and discharges to Wexford Harbour.

The interceptor is maintained, emptied and cleaned in accordance with the current licence conditions. All material removed from these are sent to an off-site treatment facility approved by the Agency.

The surface water monitoring results 2005 and 2006 indicate generally good quality surface water discharges to the open drain. There were elevated ammonia and COD levels at SW Outfall and SW2 in June and September 2005 and this was attributed to run-off from trailers, which were inadvertently parked overnight on a paved area. The results since then indicate that the facility is not having a negative impact on the drain.

### *Foul*

Sanitary and process wastewater from the offices and compactor area connects to a sump pump at the rear of the main building from where it is pumped to the Council sewer on the White Rock Road. The discharge to sewer is regulated by a trade effluent licence issued by Wexford County Council in 2005.

### *Groundwater*

There are no direct or indirect emissions to ground from the facility. Groundwater monitoring is however carried out at two on-site monitoring wells (BH3 downgradient and BH4 upgradient) twice per annum. BH3 is on the south-western boundary of the site and BH4 is at the eastern boundary of the site. BH 3 was dry during 2005 and was subsequently damaged in 2006. The well was replaced in Q2 2006, but has not yet been sampled. Monitoring was carried out at BH4 in March 2005, September 2005 and February 2006. The proposed amendment of the waste licence will not result in any new emissions to ground.

### *Dust*

Dust monitoring is carried out at five locations three (3) times per annum. The most recent dust monitoring in August - September 2006 shows elevated deposition levels in four of the five gauges. The monitoring report states however that gauges D1, D5 and D4 were affected by an algal growth, possibly due to the dilution of the inhibitor due to excessive rainfall. The level at D6 was elevated however given its location on White Rock Road means that it is affected by off-site sources such as traffic on the road not associated with the SERC facility and a construction site directly across the road from this location.

There were no exceedences of the ELV in May - June 2006. Location D1 was found to have been contaminated with bird droppings. Locations D3 and D5 were also contaminated by bird droppings in February - March 2006. The only elevated level was at D6 in February - March, but again the impact from the traffic on White Rock Road would most likely have contributed significantly to this measurement.

### *Odours*

Odour emissions are associated with the handling, sorting and transfer of both household and commercial waste due to its organic content. Emissions from handling and storage of dry recyclable material (i.e. plastics, glass, metals) and C&D waste are negligible. The current materials recovery and transfer operations which include the acceptance of waste with an organic content are not a significant source of odour nuisance.

It is proposed to accept approximately 30,000 tonnes of Commercial and Household waste per annum. This will mainly comprise skip waste from commercial customers (15,000 tonnes), wheelie bins from commercial customers (5,000 tonnes) and wheelie bins from domestic clients (10,000 tonnes).

Based on SERC's experience approximately 5% of the commercial skips will contain organic content (750 tonnes), 20% of the commercial wheelie bins (1,000 tonnes) and 35% of the domestic wheelie bins (3,500 tonnes). This equates to a total of 5,250 tonnes of organic waste per annum, the majority of which will be removed on the same day it arrives at the facility.

### *Noise*

Noise monitoring is required to be undertaken at seven monitoring locations twice per annum. The 2006 monitoring indicates that the site is generally compliant with the ELV. Both Noise Sensitive locations were not impacted by site activities. The marginally elevated measurement (57 L(A)eq) at N7 in February was attributed to noise from traffic movements on the White Rock Road (36 cars, 3 HGVs and 1 van). Noise from on-site activities were recorded, but they were not the dominant noise source. The elevated level in August (60 L(A)eq) was attributed to emissions from the construction of a housing estate site on the White Rock Road. Fifty two cars and nine HGVs passed the meter during the monitoring period and two excavators were noted in operation on the construction site. There was no exceedences of the ELV at the other NSL, N8 during 2006. The 2005 results indicate that the site was generally compliant with the ELV.

## **Assessment of the Effects of Emissions on the Environment**

### *Surface Water*

It is not envisaged that there will be any new sources of surface water emissions from the facility due to the proposed amendments to the waste licence.

### *Foul Sewer*

It is not envisaged that there will be any new sources of foul water emissions from the facility due to proposed amendments to the waste licence.

### *Groundwater*

There are no direct or indirect emissions to ground from the facility. The proposed amendments to the waste licence will not change this.

### *Dust*

It is not proposed to change the existing site activities or plant items therefore there will be no new sources of dust. There is the potential for increased dust emissions due to increased vehicle movements and waste processing. Dust emissions have not traditionally been an issue at the facility and no complaints have been received in relation to dust. Abatement measures to control dust include a sprinkler system to dampen down wastes on portions of the transfer building, regular yard and road sweeping, damping down in dry weather conditions and internal processing of wastes.

### *Odours*

There is the potential for odours from the acceptance and handling of putrescible wastes. Existing odour control measures include a sprinkler system which sprays a masking agent in the waste processing building, the quick processing and removal of putrescible wastes off-site and floor cleaning of areas used to handle putrescible wastes.

It is also proposed to carry out weekly monitoring of the facility perimeter and sensitive locations to assess the impact of odour nuisance. These measures will form part of the EMS for the facility.

### *Noise*

It is not proposed to change the existing site activities or plant items. There will be no new additional noise sources.

### **Monitoring and Sampling Points**

The proposed amendments to the current licence conditions will not result in any change to either the location of any monitoring or sampling points or the current monitoring programme.

### **Prevention and Recovery of Waste**

Waste oils generated during plant and vehicle maintenance will be collected and sent off-site for recycling.

### **Off-site Treatment or Disposal of Solid or Liquid Wastes**

The waste activities will not result in any changes to the types or method of treatment or disposal of solid and liquid wastes.

## **Emergency Procedures to Prevent Unexpected Emissions**

SERC has developed and adopted Emergency Response Procedures (ERP) to address emergencies and incidents that result in unexpected emissions, as required by the current Waste Licence.

## **Closure, Restoration and Aftercare of the Site**

The proposed amendments to the current licence will not impact on the agreed measures for the closure, remediation and aftercare of the facility.

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# **APPENDIX 1**

Drawings

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CLIENT

SERC  
 WO111-03

TITLE

Site Location

Details

O.S. Licence Agreement  
 Number AR 0038707

Ordnance Survey Ireland.  
 Government of Ireland.

FIG. No

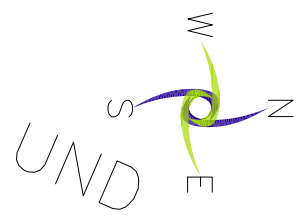
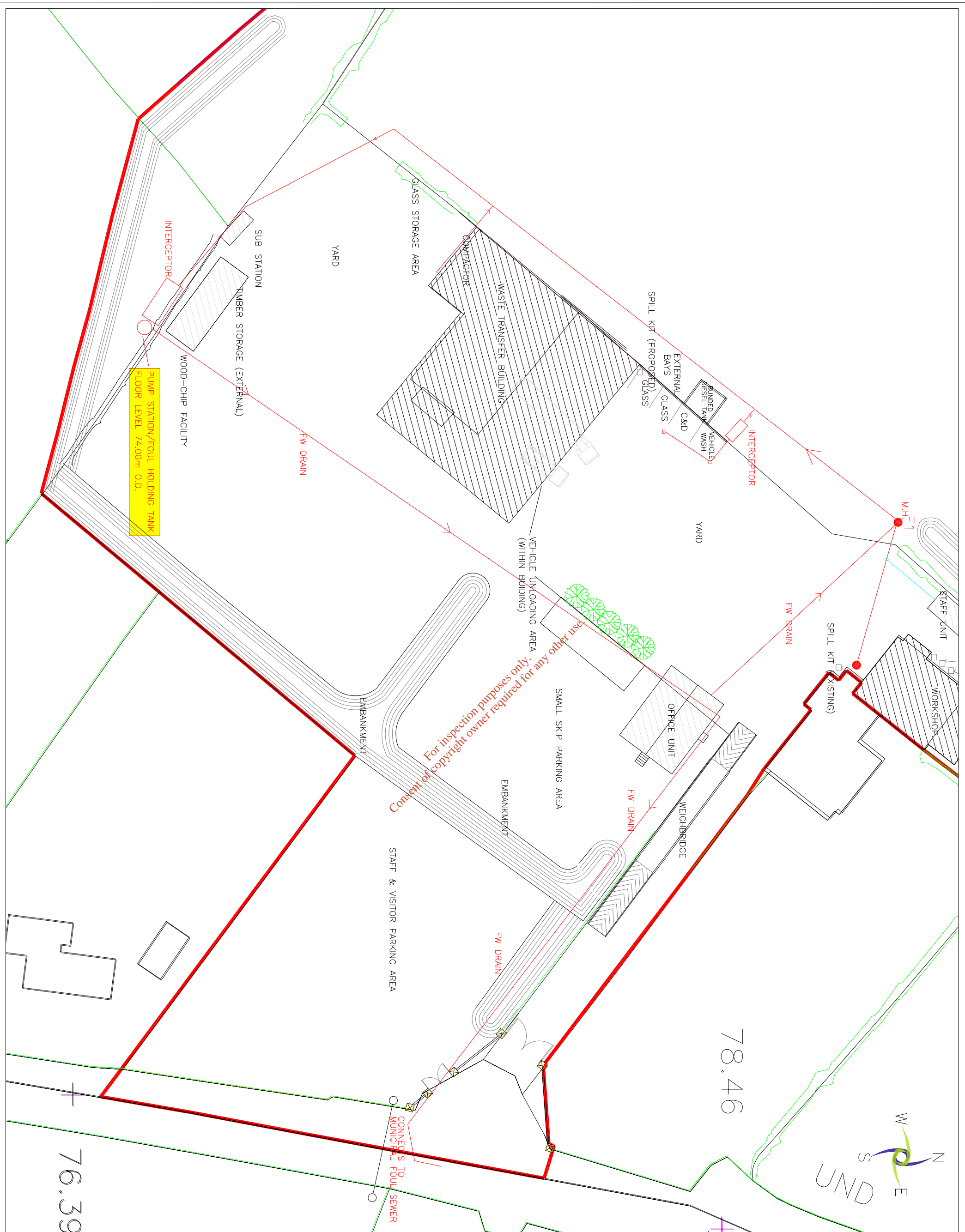
Scale

NTS




Rev.

A

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**LEGEND**

-  SITE BOUNDARY
-  FOUWATER MONITORING POINT
-  FOUWATER DRAINAGE SYSTEM

**NOTES**  
 1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING  
 2. ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MAIN HEAD

Issue	Date	Description	By	Chkd
1	14-11-08	Project set up, drawing created	PH	GH
2	14-11-08	Revised drawing	PH	GH

Client: **South East Recycling Company Ltd.**

Project: **Waste Licence Review**

Title: **Foulwater Drainage System & Monitoring Point**

Scale: **1:500@A3(1:1,000@A4)**

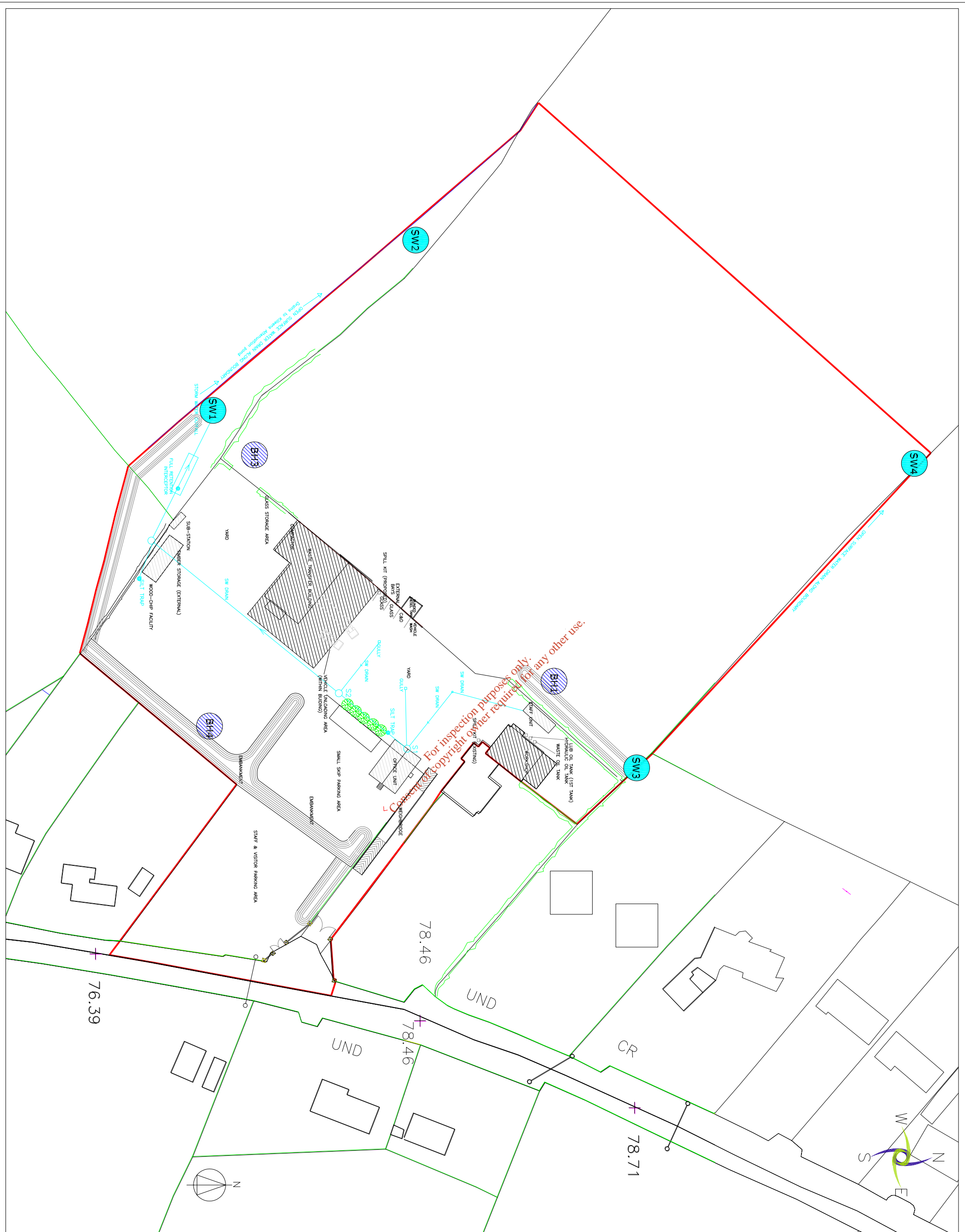
Prepared by: **G.F.** Checked: **G.F.** Date: **08-12-06**

P.M. **G.F.** Date: **08-12-06**





Project Director: **G.HITZPATRICK**

EURO Environmental Services,  
 35A Bove's Business Park,  
 Drogheda,  
 Co. DU,  
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Drawing No.: **Drawing 4** Issue: **B**



### LEGEND

-  SITE BOUNDARY
-  SURFACE WATER MONITORING POINT
-  GROUND WATER MONITORING POINT
-  STORM WATER DRAINAGE SYSTEM

**NOTES**  
 1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING  
 2. ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MAIN HEAD

Issue	Date	Description	By	Chkd.
B	20.03.07	Issue 1		
A	14.12.05	Final design for construction	PIU	GP

**Client:**  
South East Recycling Company Ltd.

**Project:**  
Waste Licence Review

**Title:**  
Site Layout,  
Storm Water Drainage &  
Monitoring Points

**Scale:**  
1:1,000@A3(1:2,000@A4)

**Prepared by:** MWV  
**Checked:** JOC  
**Date:** 20.03.2007

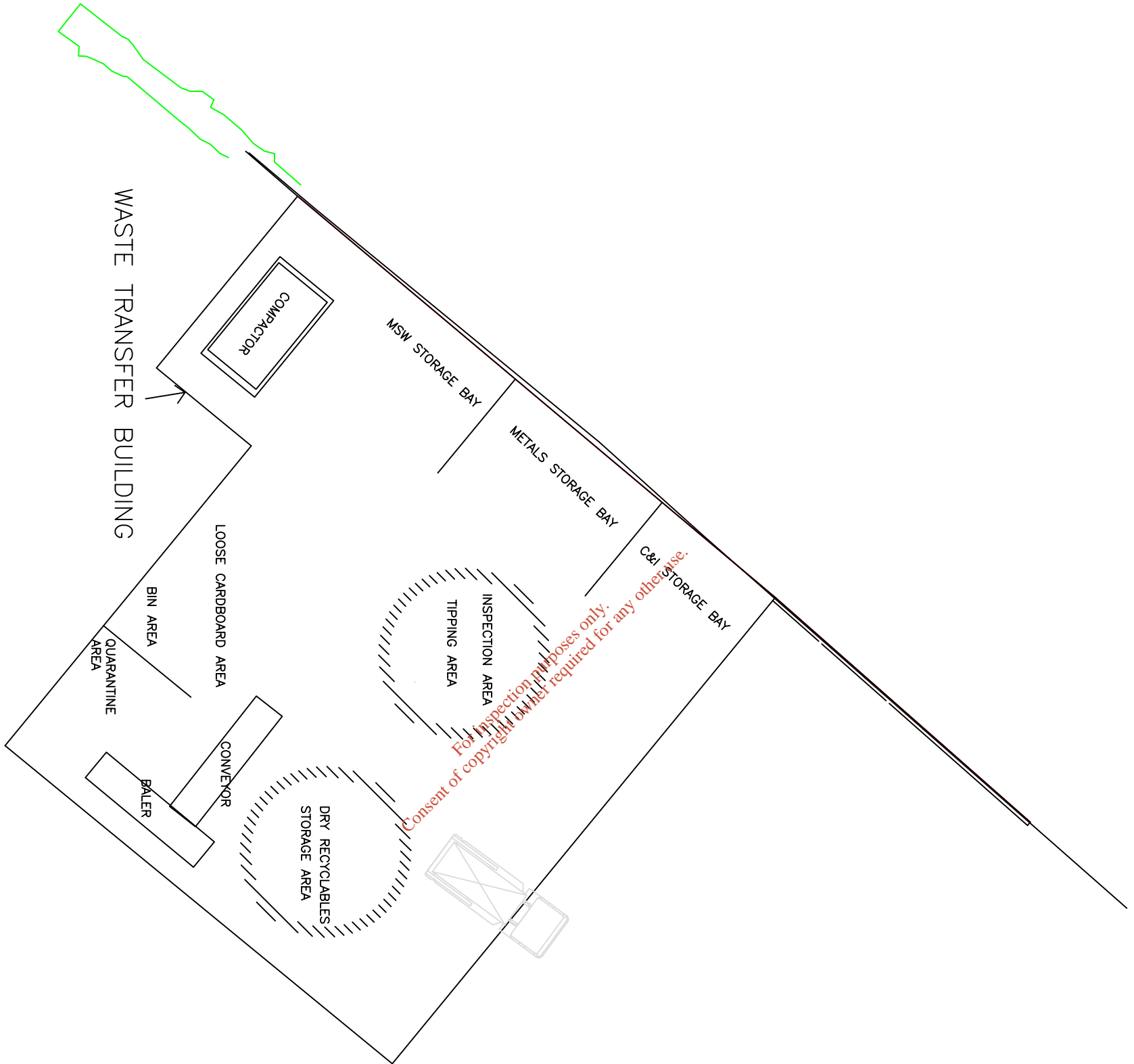
**Project Director:** CCM

**Euro Environmental Services,  
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**Drawing No.:** Drawing 1

**Issue:** B

NOTES



WASTE TRANSFER BUILDING

REV	DATE	DESCRIPTION	HW	JOC	JOC
A	30.03.2007				

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CLIENT  
**SERC**

TITLE  
 FLOOR PLAN  
 W0111-03

SCALE 1:250  
 DRAWING No. 6  
 REV. A

## **APPENDIX 2**

### Emergency Procedure

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South East Recycling co. Ltd  
Carrigbawn  
Pembrokestown  
Wexford

## **EMERGENCY RESPONSE PROCEDURE**

### **1.0 PURPOSE**

To address emergency situations and minimise potential impacts on the environment.

### **2.0 RESPONSIBILITY**

The General Manager is responsible for ensuring this procedure is implemented.

### **3.0 PROCEDURES**

The emergency response procedures are predicted by the types of emergency that may occur at this facility are discussed individually below.

#### **3.1 Health and Safety**

In the event of any serious injury or health incidents to personnel on site the emergency number for the ambulance service is clearly posted adjacent to all telephones on site. The General Manager and or Operations Manager will be notified of any incidents immediately and will assume charge in order to handle the emergency as swiftly and efficiently as possible. For minor injuries the number of the local doctor will be posted beside the telephone in the site office. In addition, first aid kits are available in the site offices.

#### **3.2 Oil Spill/Leachate spill**

All oil and diesel storage tanks are either bunded or double skinned. However, in the unlikely event of an oil spill (or a leachate spill) the following procedure will be followed:

- a) The source of the spill will be closed off immediately if possible. The site manager or assistant manager will be notified immediately.
- b) The liquid will be contained as far as is practicable by employing absorbent booms and mats around drainage gullies and in the spill liquid itself.
- c) A waste oil tanker (or tankers) will be contracted immediately to pump any liquid spill.
- d) The following Agencies will be notified by telephone at the earliest opportunity: EPA; Wexford County Council, Southern Regional Fisheries Board.
- e) All oil will be removed from the surface by either pumping or use of absorbent mats. All waste oils and materials will be disposed to an appropriate facility.

All staff will be informed as to the location and use of the absorbent materials.

### **3.3 Breakdown of Equipment**

In the event of breakdown of essential equipment all incoming waste destined for that piece of equipment will be diverted to an alternative recovery facility or directed to landfill. Waste already tipped will be reloaded and directed to an alternative facility or to a licensed landfill. The staff fitters will be notified immediately and will affect the necessary repairs.

### **3.4 Fire**

The emergency telephone number for the fire brigade is clearly posted adjacent to all site telephones.

In the unlikely event of a fire the following procedure will be employed:

- a) The alarm will automatically sound or will be switched on manually by a break glass switch by the person who first notices the fire.
- b) All staff will be evacuated from the site buildings and proceed to the Fire assembly point located at the main entrance.
- c) The fire brigade will be notified immediately.



- d) The General Manager or Operations Manager will be informed immediately.
- e) All incoming vehicles will be directed to an alternative facility and the site entrance kept clear of traffic and machinery.
- f) The EPA, Wexford County Council and the Southern Regional Fisheries Board will be notified at the earliest opportunity.

It may be possible for site staff to extinguish small fires using the fire extinguishers and fire hoses. This procedure will be restricted to small fires only and the decision will be made by the General Manager/Operations Manager.

- 3.5** All other emergencies will be notified to the General Manager/Operations Manager and dealt with as speedily and efficiently as possible.

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## **APPENDIX 3**

### Decommissioning Plan

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South East Recycling Co. Ltd  
Carrigbawn  
Pembrokestown  
Wexford

## Decommissioning Procedure

### 1.0 Purpose:

The purpose of this procedure is to establish a methodology for decommissioning of the plant and obsolete equipment.

### 2.0 Scope:

This procedure applies to all decommissioning of plant and machinery and facilities under the following situations:

- Cessation of one or more of South East Recycling Co. Ltd activities.
- Taking out of service plant and equipment.

### 3.0 Responsibility:

- 3.1 The operations manager is responsible for the execution of this procedure.

The operations manager is responsible for ensuring that Decommissioning is carried out in accordance with this procedure and any relevant environmental legislation, in a manner that will minimise any potential environmental effects.

### 4.0 Procedure:

- 4.1 Any raw materials stored on-site at the time of

Decommissioning shall be disposed/recycled through licensed Waste disposal as agreed with the regulatory authorities. All surfaces where waste has been handled or stored will be Swept and washed to clear all debris and dust. Sediment tanks Will be desludged and interceptors cleaned out. The waste from The cleaning operations will be disposed to relevant licensed Facilities.

- 4.2 Plant equipment and machinery shall be cleaned post final Operation, dismantled and stored under proper conditions until sold or transferred to another location. Any remaining equipment or parts shall be disposed/recycled through licensed waste disposal contractors, as agreed with the regulatory authorities.
- 4.3 The remaining buildings and other structures on site shall be subjected to thorough cleaning prior to final departure. The site and buildings shall be left in a safe manner and appropriate security maintained on site.
- 4.4 Final closure will be completed in accordance with local regulatory authority conditions.
- 4.5 Potential nuisances at the site are limited to operational emissions such as dust, odour, litter and noise. After closure and the cleaning of the site, there will be no potential for environmental emissions or nuisances and for this reason an aftercare management plan is not considered necessary at the site.
- 4.6 In the event of the sale of the entire plant to a new operator, the normal procedures for site purchase/ sale shall be adhered to.

## **APPENDIX 4**

Wexford County Council Letter

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Rialtas Áitiúil  
Local Government

Comhairle Chontae  
Loch Garman

Wexford County Council  
County Hall  
Wexford

Tel 053 9176500  
Fax 053 9143406  
email postmaster@wexfordcoco.ie

To **Eamon Hore**  
Senior Engineer, Environment

From **Diarmuid Houston**  
Senior Planner, Planning

Date **9<sup>th</sup> January 2006**

**RE: South East Recycling**

I refer to your memorandum received 12<sup>th</sup> December relating to EPA letter to John Mernagh of South East Recycling. An Environmental impact assessment is required for installations for the disposal of waste with an annual intake of greater than 25,000 tonnes.

The information submitted does not provide any detail on the proposed operation. However, if the activity relates to the collection, sorting and short term storage of recyclable waste and not disposal of waste, it is the Planning Authority's considered view that an Environmental Impact Statement would not be required.

Diarmuid Houston  
Senior Planner