OFFICE OF LICENSING & GUIDANCE

REPORT OF THE TECHNICAL COMMITTEE ON OBJECTIONS TO LICENCE CONDITIONS

TO:	Directors
FROM:	Technical Committee **- LICENSING UNIT**
DATE:	14th May 2007
RE:	Objection to Proposed Decision for Greyhound Recycling & Recovery Limited, Waste Reg. No. W0205-01.

Application Details	
Type of Facility:	Non-hazardous Materials Recovery Facility
Classes of activity:	3rd Schedule: 11, 12, 13 4th Schedule: 2, 3, 4(**P**), 8, 9, 11, 12, 13 (P indicates principal activity)
Location of activity:	Crag Avenue, Clondalkin Industrial Estate, Clondalkin, Co. Dublin.
Quantity of waste to be managed per annum:	250,000 tonnes
Licence application received:	08/04/2004
PD issued:	12/01/2007
First Party Objection received:	08/02/2007
Third Party Objection received	None
Submissions on Objections received:	None

Company

The application relates to a new materials recovery and transfer station in Clondalkin, Co. Dublin. The 4.5 hectare 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. Greyhound Recycling and Recovery Ltd., (GRR), has obtained planning permission for the development (SD03A/0838 - July 2005 and SD06A/04/04 – July 2006). GRR has operated the site as a dry recyclables recovery facility under a waste permit (Ref. No. WP050) since May 2005.

The proposed facility 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 per annum and the principal waste stream will be mixed commercial and industrial waste. A maximum of 33,600 tonnes of putrescible waste will be accepted at the facility, principally source segregated organic waste and the organic contaminant fraction from other commercial and industrial waste. Site operations will also include biodiesel production, processing a

maximum of 2,500m^3/annum of waste edible oil and fat ([1]EWC 20 01 25). The facility will operate 24 hours a day, seven days a week and will employ 60 to 80 people.

Two submissions were received in relation to the application and these were considered by the Board at Proposed Decision (PD) stage.

Consideration of the Objection

The Technical Committee, comprising of Ciara Maxwell (Chairperson) and Emer Cooney, has considered all of the issues raised in the objection and this report details the Committee's comments and recommendations following the examination of the objection together with discussions with the licensing inspector, Stuart Huskisson, who provided comments on the points raised. This report considers the first party objection.

First Party Objection

The applicant makes 3 points of objection, which relate to specific dust and odour controls (Conditions 6.3.3, 6.3.1) and operational controls (Condition 6.4.1) as set out in the PD.

A.1. Condition 6.3.3 (i) and 6.3.3 (ii)

The applicant objects to the following clauses of Condition 6.3.3:

(i) *Prior to the commencement of the Scheduled Activity, fast-action doors (or equivalent as agreed by the Agency) shall be installed and maintained on the entry/exit points of the Waste Recovery Buildings. The licensee shall also ensure that all other doors be kept closed where possible.*

(ii) *Prior to the acceptance of putrescible waste at the facility, the Waste Recovery Buildings shall be fitted with an odour management system. This shall include a continuous negative air pressure system with ventilated gases being subject to treatment as agreed by the Agency. The licensee shall maintain the integrity and negative pressure throughout each building to ensure no significant escape of odours or dust.*

The applicant objects to the requirement to install and maintain fast-action doors (or equivalent) on the entry/exit points and the requirement to install a continuous negative air pressure system on *all* waste recovery buildings. The applicant points out that the site comprises two purpose-built waste transfer buildings. Building No. 1 is dedicated to the reception, processing and storage of source segregated and mixed dry recyclables only. Building No. 2 will be dedicated to reception, processing and storage of mixed waste containing putrescible materials in addition to construction and demolition wastes. In the applicant's opinion, there is no justification for rapid action doors or a continuous negative air pressure system in a dry recyclables transfer building. The applicant states that Building No. 1 has been operated as a dry recyclables recovery facility under a waste permit (WP050) and that no nuisance complaints have been received since the commencement of activities [May 2005]. The applicant requests that Condition 6.3.3 (i) and 6.3.3 (ii) be amended so that they apply only to waste recovery buildings receiving, processing or storing putrescible waste.

Technical Committee's Evaluation:

The Technical Committee considers that the installation of fast-action doors (or equivalent as agreed by the Agency) is a standard requirement for all waste recovery buildings to minimise the potential for dust, odour and noise emissions. Such provisions represent BAT. The Technical Committee acknowledges that it may be that the installation of dust curtains or automatic roller shutter doors or equivalent may be

[1] European Waste Catalogue and Hazardous Waste List – Valid from 1 January 2002, EPA 2002.

deemed more appropriate for Waste Recovery Building 1, which will be used for the reception, processing and storage of source segregated, dry recyclables only. There is flexibility for agreement of the most appropriate infrastructure with the Agency and agreement should be reached and the infrastructure installed prior to the commencement of the Scheduled Activity.

The Technical Committee accepts that the wastes which GRR proposes to receive, process and store in Waste Recovery Building 1, (i.e., source segregated, dry recyclables), would not be prone to cause odours likely to require treatment. In the event of putrescible wastes being inadvertently delivered to the facility amidst the dry recyclables, it is proposed that such materials will be immediately transferred to Waste Recovery Building 2, where ventilated gases will be subject to treatment. In the intervening period, prior to the commencement of acceptance of putrescible waste, it is proposed that any such putrescible materials shall be stored in a dedicated area within Waste Recovery Building 1, whilst awaiting removal off-site in accordance with Condition 6.3.1 (see objection A.2 below). The Technical Committee considers that the requirements of Condition 6.3.3 (ii) are not justified for Building 1, on the basis of the type of waste destined for Waste Recovery Building 1 and the practicalities involved in installing a negative air extraction system for such a large building space. The environmental risk does not justify the resource and energy requirements.

The Technical Committee notes that under Condition 6.3.3 (iii), the licensee is required to prepare and submit a report on the effectiveness of the odour management system within nine months of the acceptance of putrescible waste at the facility. This report shall cover the first six months of operation of the system. Under Condition 5.5 the licensee is required to establish an odour management programme, which shall be subject to agreement with the Agency and shall be reviewed annually.

The Technical Committee proposes to amend the PD, to require the installation of an odour management system in Waste Recovery Building 2. The Technical Committee proposes to insert a new condition requiring that all putrescible waste that might be inadvertently delivered to Waste Recovery Building 1 shall immediately be redirected to Waste Recovery Building 2.

Recommendations: The Technical Committee recommends the following changes:

1. For clarity, insert the following definition in the Glossary of Terms:

Source segregated waste	***Waste which is separated at source meaning that the waste is sorted at the commercial/household premises into a dry recyclable fraction and a residual fraction. In respect of commercial/household premises provided with a door-to-door collection service for biowaste, 'separation at source' means the sorting of waste into a dry recyclable fraction, a biowaste fraction and a residual fraction and the expression 'separate at source' shall be construed accordingly.***

2. Insert two new conditions under *Condition 8 Materials Handling*, as Conditions 8.3.4 & 8.3.5 respectively:

Waste Recovery Building 1 shall be used only for the reception, processing and storage of clean, uncontaminated, source segregated, dry recyclable waste.

Waste Recovery Building 2 shall be used for the reception, processing and storage of mixed waste containing putrescible materials in addition to construction and demolition wastes.

3. Amend clauses (i) and (ii) of Condition 6.3.3 as follows:

(i) *Prior to the commencement of the Scheduled Activity, fast-action doors (or equivalent as agreed by the Agency) shall be installed and maintained on the entry/exit points* ***of Waste Recovery Building 1.*** *The licensee shall also ensure that all other doors be kept closed where possible.*

(ii) *Prior to the acceptance of putrescible waste at the facility,* ***Waste Recovery Building 2*** *shall be fitted with an odour management system. This shall include* ***the installation and maintenance of fast-action doors on the entry/exit points of the building and a*** *continuous negative air pressure system with ventilated gases being subject to treatment****,*** *as agreed by the Agency. The licensee shall maintain the integrity and negative pressure throughout* ***the*** *building* ***and shall ensure that all doors be kept closed where possible*** *to* ***prevent*** *significant escape of odours or dust.*

4. Amend *Schedule D Specified Engineering Works* to read as follows:

Specified Engineering Works
Installation of negative air pressure system for **Waste Recovery Building 2**.
Installation of dust/odour treatment system for **Waste Recovery Building 2.**
Installation of waste handling, processing, recycling/recovery infrastructure in the two Waste Recovery Buildings.
Installation of the biodiesel production plant.
Installation of internal acoustic screening for C&D waste recovery.
Installation of additional drainage network including silt traps and oil interceptors.
Any other works notified in writing by the Agency.

A.2. Condition 6.3.1

Condition 6.3.1 states:

> *All putrescible waste, stored overnight at the facility, shall be stored in suitably covered and enclosed containers within a Waste Recovery Building, and shall be removed from the facility within forty eight hours of its arrival on site or seventy-two hours in the case of a Public Holiday.*

The applicant objects to the requirement that waste stored overnight must be stored in covered and enclosed containers on the grounds that this would be operationally restrictive and without environmental rationale. The applicant lists the following reasons:

(i) All putrescible waste material will be stored in a waste transfer building equipped with continuous negative air pressure system with ventilated gas treatment, in accordance with Condition 6.3.3. In this environment, waste accepted and stored overnight will not represent an environmental or nuisance risk.

(ii) The provision by the applicant of a high capital cost odour management system should negate the need to clear the facility floor overnight.

(iii) The facility will operate on a 24-hour basis. Waste will be accepted 24 hours a day. Limiting waste offloading times, or requiring that waste be transferred overnight to covered and enclosed containers, is both impracticable and obscure in this circumstance.

(iv) The requirements of efficient, economic and environmentally sound fleet management, in addition to legislative changes are compelling waste management

companies to carry out waste collections outside of peak road usage periods. This necessitates 24-hour waste acceptance at waste facilities.

(v) New waste collection bye laws introduced by Dublin City Council restricts waste collection in the central commercial district to the hours 7 p.m. to 12 p.m. This will necessitate night-time waste acceptance.

(vi) Source segregated organic waste and waste containing putrescible content will be offloaded and stored in dedicated bunkers in the transfer building pending accumulation of sufficient volume to ship out for recovery. Transfer of this material from an odour managed environment into a covered and enclosed container overnight is not feasible or justified.

(vii) The facility will be a high volume waste transfer facility. Onward movement of waste is reliant on availability and access to recovery/disposal facilities. Operational experience has shown that various factors affect the access to these third party facilities, (e.g., wind disruption at landfill). Experience throughout the waste industry is that clearing the floor of the waste building at the end of the working day is not feasible irrespective of intent.

In light of the aforementioned reasons, the applicant requests that the stipulation that "*putrescible waste, stored overnight at the facility, shall be stored in suitably covered and enclosed containers within a Waste Recovery Building",* be removed from the condition.

Technical Committee's Evaluation: The Technical Committee acknowledges that the requirements of Condition 6.3.1 may present operational difficulties for the facility, which is licensed to accept waste and operate on a 24-hour basis. The Technical Committee has had regard to the relevant Dublin City Council Bye-Laws, which came into effect on 15th January 2007[2]. The applicant does not object to the requirement to remove waste, within 48 hours, (or 72 hours in the case of a public holiday), from the waste transfer station. The applicant proposes to accept up to 33,600 tonnes per annum of organic, biodegradable waste and there is a potential for odour nuisance. However, the Technical Committee considers that there should be adequate protection from odour nuisance within the requirements of Conditions 5 & 6, (as discussed under Objection A.1 above), particularly in terms of the negative air pressure system and ventilated gas treatment in Waste Recovery Building 2. The Technical Committee proposes to amend Condition 6.3.1 to allow for storage of putrescible wastes within dedicated bunkers in Waste Recovery Building 2 and takes into account the interim measures to be adopted prior to the commencement of the operation Waste Recovery Building 2.

Recommendation: Amend Condition 6.3.1 to read as follows:

Prior to the acceptance of putrescible waste at the facility, any putrescible materials and putrescible contaminated dry recyclables that may be inadvertently delivered to Waste Recovery Building 1, shall be stored in a dedicated area within Waste Recovery Building 1 and removed off-site for disposal/recovery as soon as practicable. Upon commencement of the acceptance of putrescible waste, all putrescible waste shall be stored in dedicated bunkers within Waste Recovery Building 2. All putrescible waste *shall be removed from the facility within forty-eight hours of its arrival on site**,** or seventy-two hours in the case of a Public Holiday.*

[2] Local Government Act 2001 (Bye-Laws) Regulations 2006 – Bye-laws for the Storage, Separation at Source and Presentation for Collection of Household Waste & Bye-laws for the Storage, Separation at Source and Presentation for Collection of Commercial Waste.

A.3. Condition 6.4.1

The applicant objects to Condition 6.4.1, which states:

> *The floor of the Waste Recovery Buildings shall be cleared of all waste at the end of the working day. The floor of the storage areas used for putresible waste containers shall be washed down and cleaned on a weekly basis.*

The applicant objects to the requirement for clearing the floor of the waste transfer building at the end of the working day stating that this would be restrictive and without environmental rationale. The applicant provides the following reasons:

(i) All putrescible waste material will be stored in a waste transfer building equipped with continuous negative air pressure system with ventilated gas treatment. In this environment, waste accepted and stored over night does not represent an environmental risk.

(ii) The provision of a high capital cost odour management system should negate the need to clear the facility floor overnight.

(iii) Source segregated dry recyclables and mixed dry recyclables are offloaded and stored in dedicated bunkers in the transfer building pending accumulation of sufficient volume to process.

(iv) Post-processing baled segregated recyclables, segregated material streams, (i.e., metal, wood, plastics), and baled mixed waste for RDF, will be stored in the waste transfer buildings pending accumulation of sufficient volumes to justify shipment off-site for recovery. Movement of these wastes off the floor at the end of the working day is not feasible or warranted, as they do not pose environmental risk or nuisance.

(v) The facility will be a high volume waste transfer facility. Onward movement of waste is reliant on availability and access to recovery/disposal facilities, (i.e., wind disruption at landfill). Experience across the waste industry is that clearing the floor of the waste building at the end of the working day is not feasible irrespective of intent.

The applicant requests that the condition be amended to remove the requirement that the floor be cleared at the end of the working day.

> Technical Committee's Evaluation:
> The Technical Committee appreciates the concerns of the applicant in relation to clearing the floors of the Waste Recovery Buildings at the end of the working day, in light of the fact that this facility will be operated on a 24-hour basis. Therefore, the Technical Committee proposes to amend the condition such that the floors will be cleaned on a weekly basis and such that storage bunkers for putrescible wastes and recyclable materials will be washed down and cleaned on each occasion such bunkers are emptied, or as a minimum on a weekly basis.

Recommendation: Revise Condition 6.4.1 as follows:

The floors of the Waste Recovery Buildings shall be cleaned on a weekly basis. The storage bunkers for putrescible wastes in Waste Recovery Building 2 shall be washed down and cleaned on each occasion that the bunkers are emptied, or as a minimum on a weekly basis.

Overall Recommendation

It is recommended that the Board of the Agency grant a licence to the applicant,

(i) for the reasons outlined in the Proposed Decision,

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

Signed,

Ciara Maxwell,

for and on behalf of the Technical Committee.