



This report has been cleared for
 Submission to the Board by
 the Programme Manager. P.Nolan
 Signed: C. Keefe Date: 6/5/07

GUIDANCE

INSPECTORS REPORT ON A LICENCE APPLICATION

To:	Directors	
From:	Kevin Motherway	- LICENSING UNIT
Date:	1/5/2007	
RE:	APPLICATION FOR A WASTE LICENCE FROM SOUTH DUBLIN COUNTY COUNCIL, LICENCE REGISTER W0228-01	

Application Details

Type of facility:	Green Waste Facility
Class of Activity (P = principal activity):	4 th Schedule: 13 (P)
Quantity of waste managed per annum:	20,000 tonnes
Classes of Waste:	Household and commercial Green Waste.
Location of facility:	Esker Lane, Lucan, Co. Dublin
Licence application received:	21/3/2006
Third Party submissions:	Yes, 1
EIS Required:	No
Article 14 compliance date:	6/7/2006
Site Inspection:	19/4/2006

1. Facility

This existing facility located at Esker Lane in Lucan Co. Dublin is currently operated by South Dublin County Council (SDCC) under a Certificate of Registration (Reg. No. R621) issued by the Agency on 8/2/2000, which permits the facility to accept up to 5,000 tonnes of waste per annum for recovery. This waste comes primarily from the general public, commercial landscape gardeners and the Parks Department of SDCC. The processing of waste on-site has in the past included the shredding of timber. The applicant proposes to increase the tonnage of Green Waste accepted to 20,000 tonnes

per annum, with the activities on-site being restricted to the acceptance, temporary storage and consignment of Green Waste (EWC Code 20 02 01) to an off-site shredding and composting facility. There will therefore be no processing of waste on-site, with the only activity being Waste Recovery Activity No. 13 of the Fourth Schedule of the Waste Management Acts 1996 to 2003 "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."

The facility will be staffed by three full-time employees consisting of a Site Supervisor and two General Operatives.

The proposed hours of operation are 0800 to 1830 Monday to Friday and 0830 to 1700 on Saturdays in summertime and 0800 to 1630 Monday to Friday and 0830 to 1530 on Saturdays in wintertime.

The proposed hours of waste acceptance are 0830 to 1730 Monday to Friday and 0830 to 1600 on Saturdays in summertime and 0830 to 1600 Monday to Friday and 0830 to 1430 on Saturdays in wintertime. The facility will be closed on Sundays and public holidays. The applicant states that any construction works required at the facility will also coincide with operational hours as outlined.

The site is adjoined to the east by a South Dublin County Council Parks Department equipment and storage depot and is surrounded by suburban housing as well as being located close to a primary school (Gaelscoil Naomh Pádraig) and sharing its eastern boundary with a secondary school (Coláiste Cois Life). The closest houses to the facility are situated to the southwest of the site on Esker Glebe at ca. 30m from the site boundary. The nearest houses to the north of the site on Esker Lane are ca. 35m from the site boundary.

Road access to the site is gained via Esker Lane, with a designated site entrance and exit. The site serves the greater Dublin area with no similar facilities permitted or licensed to accept green waste on this scale.

Consultation with the certificate of registration enforcement inspector in OEE revealed that the facility has been accepting in excess of 5,000 tonnes of waste and that there have been several complaints from residents in the surrounding area in particular regarding dust and noise associated with the shredding operations, which were carried out on-site until January 2006. No complaints regarding the operation of the facility have been received since the cessation of shredding operations. No submissions from residents have been received during the assessment of this application.

2. Operational Description

Infrastructure

The site is 0.83Ha. and comprises a 380m² office and equipment storage building and an area of reinforced concrete slab where waste is deposited by users as well as an area of open ground to the east of current operational area, which has in the past been used as a temporary storage area for green waste as well as equipment and materials used by the local authority. The site is secured with palisade fencing on all sides and a 2-3m high earthen bund has been placed along the Western boundary of the site to act as a visual/noise screen between the facility and local housing.

The site office commands a good view of the entire site with barrier-controlled access to the waste deposition area. The site is adequately lit during operational hours with the site entrance lit outside of operational hours.

Proposals included in the application to improve infrastructure and abatement measures at the site include:

- A CCTV system to cover the site entrance and exit, the traffic barrier at the site office and the waste deposition area.
- Redesign of the site roads to provide a more effective one-way traffic system on-site.
- Extension of the reinforced concrete slab to cover the entire operational and storage area of the facility. The remainder of the site to the east will be surfaced with hardcore fill.
- Installation of a weighbridge on the exit for the facility to allow the tonnage of consignments of waste leaving the site to be determined. The use of an "in" weighbridge would be impractical given the very small quantities delivered by individual users of the facilities.
- Installation of a portacabin unit to serve as a small weighbridge office.
- Provision of fire-fighting hose reels at two locations outdoors at the facility.
- The provision of a lance/power washer for use as a wheel cleaner.
- Provision of a double skinned 1,000 litre diesel tank for re-fuelling site vehicles.
- Provision of a designated waste quarantine area to isolate any waste deposited illegally on the facility or left outside the facility entrance outside of operational hours.
- Installation of a silt trap and oil interceptor at the facility.
- Provision of a sprinkler dust suppression system.
- Construction of 3m high mass concrete walls on the boundaries adjacent to the secondary school and Esker Glebe to abate noise and dust migration from the site.
- Installation of a windsock.

- Fencing off of the non-operational area of the site, to the east of the operational area.

Operations

Under the terms of the Recommended Decision (RD) the facility will only accept Green Waste (EWC Code 20 02 01) such as tree prunings, leaves and grass cuttings from domestic and commercial sources as well as the Parks Department of SDCC. No other wastes will be accepted at the facility. Site operations at the facility will comprise the following:

- Inspection / acceptance or rejection of incoming waste.
- Deposition of waste by members of the public / commercial users / SDCC Parks Department in designated concrete bays.
- Transfer of waste from the designated bays to a holding area for temporary storage.
- Loading of waste onto HGV for removal off-site.
- Weighing of outgoing waste consignments.
- Transport of waste off-site for treatment.

The on-site plant required for these operations currently consists of four waste handling machines: a Landini Top 165 Tractor with front-end loader and a JLG telescopic loader owned by the applicant as well as two 530/70 JCB telescopic loading shovels with 3m³ buckets contracted as necessary. The operation of these vehicles is the main source of noise and air emissions on-site. The main sources of dust on-site will be associated with the deposition of and the movement of waste on-site and particularly during the loading of waste onto HGVs for transport off-site. There will be no emissions to surface waters or groundwaters, with all surface water and sanitary effluent discharging to an SDCC sewer running through the site (at emission point SE1).

Condition 6.2 of the RD specifies that all wastes accepted at the site may only be stored on-site for a period of forty-eight hours in the case of normal operations and 72 hours in the case of a public holiday weekend. This is in line with current operational procedures and will ensure the minimisation of odours emanating from the site.

3. Use of Resources

▪ Fuel

The principal use of fuel at the facility is the diesel used to run the waste handling machines. A 1,000 litre diesel tank will be located on-site to provide refuelling for these vehicles.

▪ Electricity

Electricity is used to service the site offices and lighting on-site only.

- Water

Water is sourced from local authority mains, with the applicants also intending to use rainwater harvested from roof buildings on-site. Water will be used for the office building, for cleaning of vehicles as necessary and for dust suppression.

No specific quantities of materials or energy have been specified in the application. This information will be required to be included in the Annual Environmental Review (AER) as specified in Condition 7 of the RD.

4. Emissions

4.1 Air

There will be no main or minor emission points to air. Dust and odour will be the only fugitive emissions to atmosphere from the facility. The principal receptors for this dust will be operatives on-site, residents in the surrounding housing estates, a primary school and a secondary school. Dust monitoring, undertaken at the facility, on two occasions in late 2005, recorded dust deposition rates ranging from 31 mg/m²/day to 11 mg/ m²/day, well below the BAT (for 2003 Draft for Waste Transfer Activities) of 240 mg/ m²/day. This ambient air limit has been applied in Schedule B of the RD.

The acceptance and temporary storage of green waste has the potential to generate odours. During odour monitoring carried out as part of the application (using UK Environment Agency based methods), localised moderate odour was detectable on-site with the primary source being stockpiled green waste. The odour was described as being inoffensive and "woody" in nature. A faint to moderate smell was detectable at the site boundary. A faint odour was detected at only one of three sensitive receptors, O5 on Esker Lane to the north-east of the facility. This odour comprised of smells from the operation of the Green Waste facility and traffic fumes, with a similar odour description at O1 located at the site boundary opposite O5. Given that wood shredding operations have ceased and based on the restriction of on-site retention time of waste holding (specified in Condition 6.2 of the RD) as well as the nature of the green waste, I am satisfied that the facility can operate without any significant odour impact on the environment. Condition 5.2, "the general impairment/loss of amenity" condition of the RD will also oblige the licensee to operate the facility in a manner such that amongst other things no odour emanating from the site will impact on the surrounding environment or receptors. Ambient odour monitoring locations AO1, AO2 and AO3 have been proposed as weekly monitoring points by the applicant with this monitoring specified in Schedule C of the RD. The RD also specifies that an additional monitoring point AO4 be suitably located at the adjacent secondary school, Coláiste Cois Life, with the location to be agreed by the Agency. The odour monitoring method to be used is to be agreed with the Agency.

4.2 Emissions to Surface Waters

There will be no emissions to surface waters.

4.4 Contaminated Rainwater Runoff/Emissions to Sewer

All contaminated rainwater runoff generated on the concrete slab process area of the site will discharge to a manhole located in the Northwest corner of the site at the adjacent SDCC pumping station, which connects to an SDCC foul water sewer. This water will have low-level contamination given the nature of the green waste to be handled at the facility. The SDCC sewer connects to the Ringsend WWTP, which discharges into Dublin Bay. The on-site drainage system will feature an inspection manhole with an oil interceptor and grit trap prior to discharge of the contaminated water to sewer with monitoring point SE1/SEMP1 also located at this point. SDCC have indicated their intention to discharge this water to either a soakaway or surface water stream in the future and will approach the Agency with suitable proposals for same when designs are finalised.

Sanitary effluent from lavatory and washing facilities in the site office buildings will also flow into the SDCC sewer with a separate connection, which will flow into the manhole after the location of SE1. The volume and composition of this foul water will not be significant and the RD does not require this flow to be monitored.

4.5 Emissions to ground/groundwater:

There will be no emissions to groundwater at the facility. Given the installation of reinforced concrete slab for the entire operational and storage area of the facility and the management of stormwater as outlined, the risk posed to groundwater posed by the activity will be minimal.

4.6 Wastes Generated:

The applicant states that there will be no wastes arising directly as a result of the activity. The applicant proposes to enforce strict waste acceptance criteria. In the event of a user arriving on-site with unacceptable waste they will be informed they have to take the waste to an appropriate facility. The site has a waste quarantine area to deal with any unauthorised waste, which may be found on-site or any waste illegally deposited at or outside the facility outside of hours. This waste will be held in the waste quarantine area pending removal from the site within time deadlines as specified in the RD. The office and kitchen waste generated on-site will be handled by an appropriately licensed/permitted contractor. Accurate quantities of wastes generated on-site will be required to be detailed in the AER as per Condition 11.8 of the RD.

4.7 Noise:

The operation of the facility will give rise to noise emissions. The site is located along a busy suburban road called Esker Lane, which is the primary access route to the facility as well as providing access to several housing estates and schools in the area. The principal noise sources in the area are

noise arising from traffic flows (both associated and un-associated with the site) and operation of facility.

The day-time noise environment in the vicinity of the facility is already noisy, principally due to traffic, with the highest levels of noise (65.8 dB L_{Aeq}) being recorded off-site at N5, a residence on Esker Lane, opposite on-site monitoring point N1 which recorded the next highest levels of 62.5 dB L_{Aeq} . Noise levels on-site at N4 were recorded at a maximum level of 60.3 dB L_{Aeq} , due to the proximity of reversing plant machinery. Noise levels of 55.9 dB L_{Aeq} have been recorded at N5 a residence on "The Glebe" and the closest receptor to the west of the site located opposite to N4. Noise levels at the eastern boundary of the site (adjacent to the secondary school) have been recorded at a maximum level of 55.4 dB L_{Aeq} .

At the time of the noise surveys were undertaken in late 2005, four waste handling vehicles were in operation, with this number expected to reduce to two vehicles for the purposes of the proposed licensed activity. There will be no night-time noise emissions arising from the site. The applicant states that noise levels measured at residential locations (and at the school) do not appear to be dominated by noise from the site. The proposed 3m high mass concrete wall will extend up to N4 and will mitigate noise emanating from the site and the level of noise experienced at residences to the west of the site on "The Glebe" and the secondary school adjacent to the east of the site.

Under Condition 4.3 of the RD the applicant will be required to operate the facility ensuring that noise emanating from the site does not give rise to sound pressure levels greater than 55 dB L_{Aeq} at any noise sensitive locations. The applicant will be required to monitor the noise levels emanating from the facility on an annual basis and identify any additional abatement measures in terms of site plant / infrastructure or work practices, as necessary.

The applicant proposes annual noise monitoring at four locations, at sensitive receptors and at the boundaries. The locations of two of these monitoring points have been moved slightly in the RD to monitoring locations, which were used for baseline monitoring submitted as part of the application. These locations are deemed more appropriate and representative of the site environs than those proposed to be monitored by the applicant. The nomenclature of the noise monitoring points has also been clarified by the inspector (in line with EPA guidelines), with grid references for all points as referred to in the application set out in the RD to ensure the locations are correctly identified. The RD also specifies that one of the monitoring points, NSL4, to be suitably located at the adjacent secondary school, Coláiste Cois Life.

4.8 Nuisance:

There have in the past been complaints regarding noise, dust and odour from the facility mainly associated with the shredding of wood waste. Since the cessation of shredding operations in January of 2006, no complaints regarding the operation of the facility have been received by the Agency. Given the low nutritional value of the waste to be handled by the facility the

potential for nuisance due to flies, birds and vermin should be minimal. Dust levels will be controlled by water sprays, as necessary. Condition 6.3 of the licence also requires the concrete slab to be swept on a weekly basis to prevent the accumulation of mud and minimise the potential for dust blow during dry weather. The installation of a windsock at the facility will also ensure that should any odour complaints be made against the site that the wind conditions at the site will be known.

5. Restoration

Given the limited infrastructure of the site, restoration to a greenfield status or other purpose could be easily achieved. Appropriate aftercare and closure plans are to be submitted to the Agency in accordance with Condition 10 of the RD.

7. Waste Management, Air Quality and Water Quality Management Plan

The proposed increase of the tonnage handled by the facility are consistent with the aims and objectives of the Waste Management Plan for the Dublin Region (2005-2010).

8. Environmental Impact Statement

The application did not require an EIS.

9. Best Available Techniques (BAT)

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

10. Compliance Record

OEE have been liaising with the applicant regarding breaches of their permitted tonnage under the terms of Certificate of Registration (Reg. No. R621) issued by the Agency on 8/2/2000. This is the primary reason for the application for a waste licence. There have also been complaints from residents regarding noise and dust associated with shredding operations which have ceased since January 2006. No complaints have been received by OEE since the cessation of shredding operations.

11. Proposed Decision

The significant environmental aspects of this proposal are odour, dust/particulate and noise emissions. The RD specifies requirements for the prevention of fugitive dust and sets limit values for dust. The RD specifies ELV's for noise at the boundary. The RD requires the removal of waste for disposal and malodorous waste at regular intervals. I am satisfied that the conditions set out in the RD will adequately address all emissions from the facility and where activities are carried out in accordance with the conditions, it will not cause environmental pollution.

12. Submissions

There was one submission made in relation to this application. This submission from the Association of Landscape Contractors of Ireland requested that the agency specify that the facility remain open and accept waste from commercial landscapers. However the agency have no power to compel a facility to remain in operation or who the facility must accept waste from.

13. Charges

The proposed annual charge for enforcement of the RD is €8,740

14. Recommendation

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

Signed

pp Catherine O'Keefe

Kevin Motherway

Inspector

Procedural Note

In the event that no objections are received to the Proposed Decision on the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996-2005.

