



Pamela McDonnell  
Environmental Protection Agency  
Waste management Licensing  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford

23rd August 2007

our ref W0234-01/PD/Obj

Dear Ms. McDonnell,

I refer to the Agency's Waste Licence Proposed Decision W0234-01 and wish to object to some of the conditions therein.

In general Veolia compliments the Agency on the issuing for the most part a very practical licence. However there are some conditions of the licence that Veolia feel are inappropriate for the facility and accordingly wish to submit the attached objections for the Agency to consider. The objections are sincere and are based on the experience Veolia has in operating transfer stations and composting facilities with regards to licences which the company currently holds in Ireland.

The application submitted to the Agency is for the handling of approximately 10,000 tpa under current operations with the intention of the facility to cater for approx 20,000 tpa with future development. The process for development of the facility is currently underway however Waterford City Council is legally bound to follow a procedure to tender these works for procurement purposes. Only until such a time as tender documents have been received and reviewed can future development proceed at the facility. This in itself is a lengthy process. In the interim we envisage some difficulties with several aspects of this licence and as such are bringing this to the attention of the Agency.

The fee of 500 Euro is attached as required.

Yours sincerely,



**Michael Storan**  
Compost Facility Manager

### **Condition 1.4.3**

**The facility shall be operated only during the hours of 0700 to 2200 Monday to Friday inclusive and 0700 to 1800 on Saturdays and Bank Holidays.**

Waterford City Council request that the hours of operations are extended from 0700 to 2400 Monday to Friday. This is to facilitate the processing of waste from the Waste Reception Building into digesters in the event that waste is received up to 2030. This will minimise the storage of waste overnight on the Waste Reception Building floor.

In addition, in the time period since the application was received by the Agency there has been modifications to the operations at the facility. In order to increase efficiency in the removal of contamination, double screening of material is now required. This has substantially increased the duration of screening operations on site. It is in this regards that Waterford City Council request the hours of operation to be extended from 0700 to 2400 Monday to Friday.

### **Condition 3.18.2**

**The licensee shall provide and maintain an impermeable concrete surface in the areas of the facility shown on Drawing No. 2006-289-01-301; the surfaces shall be concreted and constructed to British standard 8110 or an alternative as agreed by the Agency.**

The requirement to maintain a concrete surface in the areas of the facility shown on Drawing no. 2006-289-01-301 is deemed unnecessary as this area is currently covered in Asphalt.

Waterford City Council requests that the word "concrete" be removed from the licence.

### **Condition 3.20.2**

**To provide for the aerobic composting (indoor or outdoor), the licensee shall provide the composting material with: a 5% minimum concentration of oxygen within the pore spaces, appropriate moisture levels, ph 6.0-9.0, appropriate C:N ratio.**

Condition 3.20.2 mandates that certain composting parameters are always achieved, such as a level of no less than 5% oxygen. From experience the requirement to maintain 5% minimum concentration is not a requirement at the latter and final stages of composting, particularly when the material is under storage. It is suggested that while the composting parameters set down in this condition are objectives for good plant operation, they should not be mandatory in the manner set down in the licence.

It is Waterford City Council's view that Condition 3.20.2 should not form part of the licence or if so request clarification regarding the stages of composting that 5% oxygen concentration is required at this facility.

### **Condition 3.23.2**

**The wheel cleaner shall be used by all vehicles leaving the facility as required, to ensure that no process water or waste is carried off-site. All water from the wheel cleaning area shall be directed to the trade effluent drainage network.**

It is the intention of Waterford City Council to install an automatic wheel wash at the facility within a three month timeframe from date of this letter. The wheel wash will be located at the entrance to the Waste Reception Building in accordance with the Department of Agriculture requirements under the Animal By-Products Regulations.

In accordance with Animal By-Products Regulations this water cannot be treated as trade effluent and as such all water from the wheel wash area will be directed to the leachate collection tank on site.

Waterford City Council objects to the installation of a wheel wash at the entrance/exit of the facility as all vehicles leaving the waste reception area will be sufficiently cleaned and the road network for vehicle movements on site will be constructed of asphalt.

#### **Condition 3.26**

**Within nine months of the date of grant of this licence a continuous monitoring system shall be installed and maintained at the facility which shall as a minimum record and relay the temperature and oxygen content of the compost at all stages during its production. All facility operations linked to the telemetry system shall also have a manual control which will be reverted to in the event of break in power supply or during maintenance.**

From experience Waterford City Council do not foresee continuous oxygen monitoring as a requirement at the facility. The deviation in oxygen content in any and/or all stages of the composting process is insignificant from an hour to hour/day to day basis. Analysis of oxygen by manual means would be more appropriate on a weekly basis for this purpose.

Waterford City Council request that continuous oxygen monitoring be replaced by weekly manual monitoring in this instance.

#### **Condition 5.4**

**Trade effluent, leachate and/or contaminated storm water shall be discharged to the on site waste water treatment plant and the leachate holding tank. No trade effluent, leachate and/or contaminated storm water shall be discharged to surface water drains and courses, unless otherwise agreed by the Agency.**

There is no waste water treatment plant at the facility. All leachate, floor washdown and wheel wash water will be discharged to the leachate holding tank on site.

Waterford City Council request clarification as to regards treatment of trade effluent and more specifically in this instance to this facility.

#### **Conditions 6.17.4 and 6.17.5**

**All wastewater from composting operations shall be collected and re-used in the composting process where possible. Any wastewater from the composting operations that is not re-used shall be discharged to the process wastewater drainage system.**

**All leachate from the composting operations shall be collected and reused in the composting process where possible.**

These two conditions place the requirement on the City Council to re-use composting leachate and wastewater where possible. The City council feels that these conditions do not fully reflect the situations under which leachate and/or wastewater recirculation can be employed.

Leachate and wastewater generated by reception building washdown and initial intensive composting in the digesters can only be re-circulated at the front end of the composting process due to the high levels of pathogens found in the remnants of raw and early composted material. Recirculation of these liquids at the curing/maturation phase of the composting process would reintroduce high levels of pathogens to the composting material. This would

contravene the operating recommendations of the Department of Agriculture and Animal By-Product Regulations where material flow is from 'dirty' to 'clean' areas with the reception building considered as a dirty area and the curing area as a clean area.

Recirculation of leachate and wastewater from the curing/maturation phase into the curing material is acceptable however the facility does not have the means or infrastructure to carry this out at present.

As all wastewater and leachate generated on site will be stored in a single leachate holding tank, all leachate and wastewaters will be considered 'dirty' in origin and will only be suitable for recirculation at the front end of the composting process.

It should be noted that there is limited scope for recirculation of liquids at the front end of the process and this is highly dependant on the moisture contents of the particular feedstock material being processed.

As such, Waterford City Council requests that Conditions 6.17.4 and 6.17.5 are reworded to state that liquids will be re-circulated where possible 'such that recirculation will not impinge on the reduction of pathogens as part of the composting process'.

#### **Condition 6.17.6**

**Any biowaste accepted at the facility for composting (other than bulking agents, e.g. woodchip, cardboard) shall be processed and put into the aerated composting area within twelve hours of its arrival at the facility.**

The City Council feels that this timeframe is restrictive given the operating hours of the facility. While it is understood that the desire of the Agency is that material is not stored overnight to minimise any possible generation of odour, the City Council feel that the control measures required by Condition 6.15 will be sufficient to ensure that odour generation within the reception building is minimised especially with the maintaining of negative air pressure within the building and the installation of fast action doors.

As it stands, if material were to be delivered to the facility at 2030 on a given day, then this material must be processed before cessation of operations at 2200. Given the limited throughput of the processing equipment, it would not be possible to process a typical delivery (approximately 15-20 tonnes) within this 2 hour timeframe especially if there was remaining waste to be processed prior to the delivery at 2030.

Also, operational practice at the facility cannot process each delivery separately as each load of waste is generally piled together with existing loads after delivery and inspection. Space restrictions in the reception building will not allow for processing of each load of waste separately. Consequently, it is not possible to accurately determine the arrival time of each portion of the waste and hence which waste requires processing first.

It should be noted that as part of the Department of Agriculture and Food 'Conditions for approval and operation of Composting and Biogas Plants treating Animal By-Products in Ireland' hygiene requirements recommend that waste material is 'transferred as soon as possible, preferably within 24 hours of arrival at the plant'.

Waterford City Council request that Condition 6.17.6 be reworded to allow for a 24 hour period for processing of biowaste material in line with the Department of Agriculture and Food guidelines.

**Condition 6.17.8**

**The licensee shall on a daily basis monitor and record the temperature and the moisture content of the material at a number of locations to be agreed in advance by the Agency.**

Waterford City Council request clarification of the term 'material' in this instance as there is deemed several types of material throughout the composting process.

Waterford City Council also objects to a daily monitoring of moisture content as the deviation in moisture content in any and/or all stages of the composting process is insignificant from a day to day basis. Analysis of moisture content on a weekly/fortnightly basis would be more appropriate for this purpose.

**Condition 6.19**

**The green waste shredder shall be located indoor and shall only be operated indoors between the hours 08:00 and 18:00.**

At present shredding takes place at the facility once every 4-6 weeks. Only green waste from public drop-off received at the facility is shredded on site. The shredding constitutes one 8 hour day during the 4-6 week period.

The current infrastructure at the site cannot facilitate indoor shredding at present. It is intended that future development will accommodate shredding of green waste indoors, however current operations do not cause significant impact of the surrounding environment due to minimal shredding activity taking place.

As such Waterford City Council object to shredding indoors at the facility under current operations.

**Condition 10.1**

**Following termination, or planned cessation for a period greater than six months, of use or involvement of all or part of the site in the licensed activity, the licensee shall, to the satisfaction of the Agency, decommission, render safe or remove for disposal/recovery, any soil, subsoils, buildings, plant or equipment, or any waste, materials or substances or other matter contained therein or thereon, that may result in environmental pollution.**

This condition mandates that decommissioning must take place "following termination, or planned cessation for a period greater than six months".

This condition seems unduly harsh for the reason that it makes decommissioning compulsory after any period of six months where no waste was processed. There may well be good reasons why the acceptance/processing of waste ceases for a prolonged period and then restarts. Examples might be where the ownership of the premises changed, where a major re-development of the premises takes place or for reasons outside the licensee's control – an animal disease outbreak causing all national composting activities to cease is an obvious example.

Waterford City Council request that the Agency reword Condition 10.1 to read:

"Following termination, or planned cessation for a period greater than six months or other time agreed with the Agency".....

### **Schedule C.3**

There is no Schedule C.3 as part of this Licence.

### **Schedule C.4**

#### **Waste Monitoring**

Waterford City Council request clarification from the Agency as to what constitutes 'Trade Effluent' in this instance and more specifically how it relates to this facility.

### **Schedule F**

#### **Compost Quality Maturity**

It is considered that some of the requirements of Schedule F are inflexible and unreasonable. Examples where Schedule F may cause the City Council to commit a criminal offence if the requirements are breached concern:

- A) If any compost sample exceeds 1.2 times the quality limit set.
- B) If the pile is not "conducive" to aerobic activity
- C) If the pathogen levels exceed the levels set down in Table 3
- D) If compost contains any sharp foreign matter measuring over 2 mm dimension.

It is considered inappropriate that a criminal offence should arise in these instances. The appropriate response is to require that the composting activities continue (or are re-started) or that the material is disposed of by landfill or as landfill cover.

Moreover, the City Council is concerned about the requirement that compost is either cured for 21 days or, if this is not achieved, for a further period of no less than six months. The six month period seems to be unreasonable as it requires any compost that is not cured in 21 days to be held for this duration, regardless of whether the composting operation is complete in, for example, 22 days.

Waterford City Council request that the reference to a six month retention period is delete and any compost that fails to meet the required parameters is either re-composted or disposed of off-site to a relevant facility.