



01

This report has been cleared by the  
Programme Manager for submission  
to the Board/OCLR Director

Signed: [Signature] Dated: 01/04/2009

**RESOURCE USE****LICENSING UNIT MEMORANDUM**

<b>TO:</b>	Ms Laura Burke, Director
<b>C.C:</b>	Mr Frank Clinton, Programme Manager;
<b>FROM:</b>	Ms Suzanne Wylde, Inspector
<b>DATE:</b>	1 <sup>st</sup> April 2009
<b>RE:</b>	Technical Amendment to Licence Register Number W0053-03), held by Greenstar Ltd, Fassaroe Depot, Bray Co. Wicklow.

**1. Introduction**

The Agency first granted a waste permit to Noble Waste Disposal Limited to operate a waste transfer station at Fassaroe, Bray, Co. Wicklow in December 1999. The company was issued a revised licence in April 2003 and again in June 2006, at which time the company was taken over by Greenstar Ltd.

**2. Technical Amendment**

The licensee has requested a technical amendment to remove Condition 3.14 from their licence:

*Condition 3.14: Wood Shredding*

*Within six months of the date of grant of this licence, the licensee shall enclose the wood shredder at the facility. SEW proposal in accordance with Condition 3.2 shall include measures to mitigate noise and dust nuisances.*

The licensee has stated that this condition was inserted into the licence based on historical activities. At the time of the licence review in June 2006, there was a serious problem with waste management procedures at the site. A condition was placed in the licence requiring all waste processing to be carried out indoors, except the shredding of wood, which was required to be enclosed within 6 months as per Condition 3.14. Until such time as the wood shredder was enclosed, the licensee was also required to only operate the machine when the wind speed does not exceed 10.7 m/s and Force 5 (fresh breeze on the Beaufort scale of wind force).

The shredder is located 250m from the closest residents located to the east of the site. The site is also enclosed by earthen embankments to the north and south.

Dust emissions from the shredder are controlled by a dust suppression system that sprays a water mist over each step of the shredding process. The licence includes a dust emission limit value of 350 mg/m<sup>2</sup>/day, as standard. *Schedule C.6: Ambient Monitoring – Air Monitoring* requires the licensee to monitor dust deposition at four locations around the perimeter of the site using the Bergerhoff Standard Method.

The Bergerhoff method measures and reports the suspended and dissolved solids fraction that is present in the collected sample. The Bergerhoff method does not prevent the entry of organic material to the sample and the licensee has indicated difficulties with bird droppings interfering with measurements.

The licensee submitted results from the monthly monitoring for 2008. The results showed three exceedances of the licence limit. The licensee did not attribute any of these exceedances with the wood shredder. Some of the exceedances were attributed to damage by on-site construction traffic and others to the on-going problem of gauges being contaminated by bird excrement. Measures were put in place in November 2008 to protect the gauges. These measures include the placement of rigid cable ties vertically around the gauge holders to prevent birds landing. Dust monitoring carried out since these protective measures were put in place have not been contaminated. I am satisfied that the protective measures put in place are mitigating the problem of bird excrement in the dust samplers and the licensee can continue to conduct dust monitoring using the Bergerhoff gauges

In addition to the protective measures, previous problems with dust were reportedly related to the construction of Phases 1 & 2 of the site infrastructure and the administration building. These projects have since been completed.

Considering that on-site construction traffic has significantly been reduced in the past 12 months and that protective measures have been put in place at the dust monitors, I am satisfied that Condition 3.14 can be deleted from the licence.

Condition 6.3.4 of the licence states the following:

*Prior to the shredder being enclosed in accordance with Condition 3.14, the timber shredder shall not be operated when wind speeds exceed 10.7 m/s (Force 5).*

As a consequence of the recommendation to delete Condition 3.14, I recommend that Condition 6.3.4 be amended to read as follows:

*The timber shredder shall not be operated when wind speeds exceed 10.7 m/s (Force 5).*

### **3. OEE Consultation**

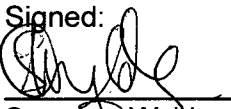
The OEE inspector for the facility was consulted in relation to this request for a technical amendment. The OEE advised that the request could not be accommodated under the conditions of the licence.

Since the reviewed licence was granted in June 2006, there has been an on-going number of non-compliances at the facility, one of which relates to Condition 3.14 of the licence. There were two non-compliances issued to the licensee in 2007 in relation to dust and none have been issued since then on the matter. The Agency received four complaints regarding dust in August 2006. No further complaints have been received by the Agency since that time.

### **4. Recommendation**

I recommend that the licence amendment be approved as set out in the attached Recommended Technical Amendment.

Signed:



Suzanne Wyde  
Inspector

Office of Climate, Licensing & Resource Use