

**This Report has been cleared
for submission to the Board by
the Programme Manager F Clinton
Signed: N. Keavey Date: 8/7/09.**



**OFFICE OF CLIMATE,
LICENSING &
RESOURCE USE**

**REPORT OF THE TECHNICAL COMMITTEE ON
OBJECTIONS TO LICENCE CONDITIONS**

TO:	Directors	
FROM:	Technical Committee	- LICENSING UNIT
DATE:	08 th July 2009	
RE:	Objection to Proposed Decision for Advanced Environmental Solutions (Ireland) Ltd., Waste Reg. No.: W0240-01.	

Application Details

Class(s) of activity:	3 rd Schedule: 11, 12, 13 (P) 4 th Schedule: 2, 3, 4, 12, 13
Location of activity:	Solsborough, Springfort Cross, Nenagh, County Tipperary.
Licence application received:	06 th November 2007
PD issued:	22 nd April 2009
First party objection received:	19 th May 2009
Third Party Objection received	None
Submissions on Objections received:	None
Article 26/27 Issued:	No
Additional Information received:	None
Article 35 extension of time:	No

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Initials: KS

Company

The application relates to Advanced Environmental Solutions (Ireland) Ltd., an existing waste transfer station at Solsborough, Springfort Cross, Nenagh, County Tipperary. The area of the site is leased by the applicant and is located in an urban fringe of Nenagh town. The facility has been operating under a Waste Permit (Register Ref. No. WPTN 01) from North Tipperary County Council. The main activity is the temporary storage of waste prior to transfer to another facility for recycling, recovery, processing or disposal. The main waste types being handled are commercial, household and construction & demolition waste. No hazardous waste is to be accepted at the transfer station. The applicant proposes to accept 24,750 tonnes of waste per annum and has requested the following waste activities:

3rd Schedule: Class 11, 12 and 13 (Class 13 is principal activity)

4th Schedule: Class 2, 3, 4, 12 and 13.

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

Consideration of the Objection

The Technical Committee, comprising of Alison McCarthy (Chair) and Stuart Huskisson, has considered all of the issues raised in the Objections. This report details the Committee's comments and recommendations following the examination of the objections, together with discussions with the licensing inspector, Ewa Babiarczyk, who also provided comments on the points raised.

This report considers the first party objection, which consists of three main points. The main issues raised in the objection are summarised below, however, the original documents should be referred to at all times for greater detail and expansion of particular points.

First Party Objection

The applicant has raised three points of objection to the Proposed Decision.

A.1. Condition 1.7.3

The applicant objects to the closure of the facility on public holidays, as it would impact on their flexibility to accept waste. They comment that should Christmas Day fall on a Monday, there would be three days when they would be unable to accept waste, and that this could lead to issues with balancing waste collection.

Technical Committee's Evaluation: Condition 1.7.3 stipulates that the facility should not operate or accept/dispatch waste on Sundays or on Public Holidays without the agreement of the Agency. Should it occur that the applicant wishes to operate on a particular Public Holiday, they should seek prior agreement with their OEE inspector.

In reference to Public Holidays, Condition 3.20.1 refers to Bank Holidays, and this should be amended to Public Holidays in accordance with the new transfer station annex for licence templates.

Recommendation: Amend Condition 3.20.1 as follows:

3.20.1 All putrescible waste accepted at the facility, including the civic waste facility, for disposal or recovery off-site shall be removed within forty eight hours of its arrival on-site, with the exception of **Public** Holidays when waste shall be removed within seventy-two hours.

A.2. Condition 3.18.1

The applicant objects to the condition to provide wheel cleaners at the facility. They state that waste vehicles will be inspected regularly and in the event of waste being identified on wheels that they will be washed at the bin washing area, and all washings will be contained and disposed of appropriately. The site will be swept regularly to prevent against waste material on the public highway.

Technical Committee's Evaluation: The facility will be collecting a variety of commercial, household, and construction & demolition waste, delivered in AES refuse collection vehicles used for kerbside collections, and skip collection vehicles. All waste streams are transported off-site either for recovery, recycling, further processing

or disposal. The TC considers that there should be provision for cleaning vehicle wheels to prevent waste from being carried off-site, and the bin washing facilities can be used for this purpose. The TC requires all vehicles leaving the facility to be inspected, and for wheels to be washed at these facilities as required.

Recommendation: Amend Condition 3.18 as follows:

3.18 Weighbridge and Wheel Wash Facilities

- 3.18.1 The licensee shall provide and maintain a weighbridge and wheel washing equipment at the facility.
- 3.18.2 Vehicles leaving the facility shall be inspected, and washed as required, to ensure that no trade effluent/storm water or waste is carried off-site. All water from the wheel cleaning area shall be directed to the trade effluent drainage network.
- 3.18.3 The wheel washing area shall be inspected on a daily basis and drained as required. Silt, stones and other accumulated material shall be removed as required from the wheel wash area and disposed of appropriately.

A.3. Condition 3.24.1.2

The applicant objects to the requirement to maintain negative air pressure in the waste transfer building with ventilated gases being subject to treatment. Brown bins are currently collected on a pilot scheme basis, but it is proposed to extend this in Nenagh in the coming months. The contents of the brown bins are transferred to an ejector trailer and taken to a composting facility as soon as possible. The applicant states that this process does not generate odour at/around the site, nor has the site received odour complaints. The applicant considers it unfair and unnecessary to consider it 'processing putrescible waste'.

Technical Committee's Evaluation: Putrescible or biodegradable waste is mainly contained within the mixed domestic waste and the mixed commercial waste collected at the facility. A maximum of 10,529 tonnes/annum of household waste, and 12,730 tonnes/annum commercial waste, is permitted in *Schedule A* of the RD. Brown bins are collected and brought to the facility and this scheme is planned to increase in Nenagh in the coming months. *Condition 3.20.1* requires all putrescible waste to be removed within 48 hours of its arrival on site, with the exception of Bank Holidays when this type of waste shall be removed within 72 hours.

The nearest dwelling to the facility is located approximately 40 m across the road from the South Western corner of the site. There are two commercial buildings just across the road from the Southern and Eastern site boundaries. To the North and West the facility adjoins a farm.

Considering the waste activities at the facility, there is a potential for odour generation from putrescible waste at the site. The draft *BAT Guidance Notes for the Waste Sector: Waste Transfer Activities 2008* recommends the use of appropriate air filtration systems to remove odours. Given the potential for odour generation, and the location of the facility in relation to dwellings and commercial buildings, the TC considers the requirement for negative air pressure with ventilated gases being subject to treatment, to be appropriate.

Condition 3.24.1.2 allows for some flexibility for the licensee to demonstrate to the Agency at a later date that it may not require negative air pressure in all buildings processing putrescible waste.

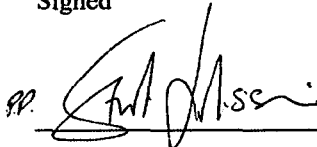
Recommendation: No change.

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

Signed



Dr. Alison McCarthy

For, and on behalf of the Technical Committee