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17 AUG 2009  
SCANNED

This Report has been cleared  
for submission to the Board by  
the Programme Manager

Signed: J. Kelly Date: 13/08/09



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

**INSPECTORS REPORT ON A LICENCE APPLICATION**

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|-------|---|
| TO:   | DIRECTORS   |
| FROM: | Yvonne Furlong<br>Environmental<br>Licensing Programme  |
| DATE: | 13 August 2009  |
| RE:   | Application for a review of a waste licence from Wallace<br>Recycling Limited, Unit 14-17 Mullingar Business Park,<br>Mullingar, Co. Westmeath. Licence Register W0197-02 |

**Application Details**

|   |  |
|---|--|
| Type of facility:                               | Waste Transfer Station   |
| Class(es) of Activity (P = principal activity): | 3 <sup>rd</sup> Schedule: Classes 11 and 13<br>4 <sup>th</sup> Schedule: Classes 2, 3, 4, and 13         |
| Quantity of waste managed per annum:            | 50,000 tonnes  |
| Classes of Waste:                               | Household waste, commercial waste, industrial waste, construction and demolition waste, hazardous waste. |
| Location of facility:                           | Unit 14-17 Mullingar Business Park, Mullingar, County Westmeath  |
| Licence application received:                   | 5/06/08  |
| Third Party submissions:                        | None   |
| EIS Required:                                   | No   |
| Article 14 Notices sent:                        | 29/07/08, 18/09/08   |
| Article 14 replies received                     | 22/08/08, 05/09/08, 11/06/09   |
| Article 14 compliance date:                     | 06/07/09   |
| Site Inspection:                                | 15/07/08   |

## **Facility**

Wallace Recycling Limited operate a waste transfer station and recycling facility at an existing licensed premises at Units 14 -17 Mullingar Business Park. Wallace Recycling Limited began operating a waste facility at the site in 2000 under a waste permit issued by Westmeath County Council. In September 2005, Wallace Recycling Limited obtained a Waste Licence (W0197-01) from the EPA. This licence was technically amended in 2007 to allow for an extension to the site boundary and extended hours of operation. The site is approximately 2 acres and is located within an industrial estate approximately 1 km south west of Mullingar town. Industrial and business units surround the site.

A site inspection of the facility was carried out on the 15 July 2008. The facility is located in an industrialized area of Mullingar town. On the day of the Agency's site visit no odours were detected outside the waste transfer building.

Wallace Recycling Limited is applying for the review of their waste licence to become an authorised treatment facility for the depollution of end-of-life vehicles. They are not looking for an increase in the annual waste intake. The quantity of waste accepted at the site will remain at 50,000 tonnes per annum.

## **Operational Description**

The facility is currently licensed to accept household waste, commercial and industrial waste and C&D waste.

When the waste arrives at the facility it is emptied inside the main building. The mixed waste is sorted to remove all of the recyclable materials, which is sieved, crushed, shredded and baled before being sent off-site for recycling. The residual waste that is not suitable for recycling is sent off-site to landfill.

This licence review seeks authorisation to depollute end-of-life vehicles (ELVs). The depollution activity will take place within a purpose built depollution shed, with an impermeable concrete floor. Wallace Recycling Limited is currently in the process of applying to Westmeath County Council for planning for the depollution shed. ELVs will be accepted from members of the public, Westmeath County Council and commercial customers. Depollution of the ELVs will include preliminary activities such as removing the battery, removing fuel caps, removing wheels and lowering windows, followed by depollution, which is mainly the removal of fluids and other items such as seat belt pre-tensioners and undeployed airbags. The following fluids will be removed; engine oil, transmission oil, coolant, hydraulic oil, screen washing, fuel, suspension fluid and air conditioning refrigerant. All the fluids will be stored in separate containers in a bunded storage area prior to specialist recovery and disposal.

Undeployed airbags or seat belt pre-tensioners will be removed or deployed. They need to be removed or deployed in order to prevent problems occurring during subsequent metal recycling. The applicant proposes deploying the airbags whilst still in the vehicle using a purpose made air bag deployer.

The RD includes the requirements of the Waste Management (End-of-life Vehicles) Regulations 2006, S.I. No. 282 of 2006. These regulations set out the obligations on and the minimum technical requirements for authorised treatment facilities.

Following depollution, the depolluted parts will be transported for onward recycling. Condition 8.16 of the Recommended Decision (RD) specifies, in accordance with the Waste Management (End-of-life Vehicles) Regulations 2006, S.I. No. 282 of 2006, operations to be carried out in relation to end-of-life vehicles to promote the reuse and recycling of the various elements of an end-of-life vehicle. Condition 8.18 of the RD specifies national reuse, recovery and recycling targets in relation to end-of-life vehicles deposited for appropriate treatment and recovery at an authorised treatment facility.

The RD specifies that Wallace Recycling Limited shall only commence the activity of appropriate treatment and recovery of end-of-life vehicles once all appropriate infrastructure is in place on site. This includes a fully enclosed depollution shed and any other infrastructure required by the Agency.

### **Use of Resources**

Wallace Recycling Limited use diesel on-site for refueling plant and machinery. It is estimated that the annual usage of diesel on-site is 39,000 litres. The skip lorries are refueled at a local filling station.

Electricity is main source of energy used on-site. Electricity usage for 2007 was 37.5 megawatts. There are no boilers or burners on-site.

In accordance with the current waste licence an energy audit was carried out in April 2008, a programme will be developed to achieve energy and cost savings based on the recommendations of this report.

Wallace Recycling Limited used approximately 127m<sup>3</sup> of water in 2007.

Condition 7 includes conditions dealing with water, energy and raw material use, reduction and efficiency on site.

### **Emissions to Air**

There are no point source emissions to atmosphere from this facility. Generally the main atmospheric emissions from this type of facility would be dust and odour. Dust monitoring has been carried out in accordance with the conditions of the current waste licence. The results show that dust emissions from the facility are well within the limits set in the current licence.

Odour complaints have been received in relation to the facility. The RD requires that no emissions, including odours, from the activities carried on at the site shall result in an impairment of, or an interference with amenities or the environment beyond the facility boundary (Condition 5.2). The RD also specifies that the licensee shall undertake, within six months of date of grant of the licence and as required by the Agency, an odour assessment which shall include as a minimum the identification and

quantification of all significant odour sources and an assessment of the suitability and adequacy of the odour abatement system to deal with these emissions (Condition 6.17).

In addition, the applicant states that they employ good housekeeping measures on site. The applicant also states that a probe atomizer odour control system has been installed within the materials recycling facility. The application also outlined additional measures implemented at the site to reduce odour emissions, these include rejecting highly odorous wastes, and all wastes being tipped, handled and stored inside an enclosed building.

### **Emissions to Sewer**

All trade and sanitary effluent and storm water from the facility are currently discharged to foul sewer. The effluent flows to the Clonmore sewage treatment plant from where the treated effluent is discharged into the River Brosna.

Emissions to the sewer, located adjacent to the northern boundary of the site, are via interceptors situated external to the materials recycling building and at the site entrance. There are two further interceptors in the yard to the south of the materials recycling building, these discharge to the sewer which runs along the southern boundary.

There are three monitoring points for emissions to sewer from the facility. EF1 is located in the northeast corner of the building, EF2 is located at the site entrance and EF3 is located in the southeast corner of the site. The applicant requested that the monitoring point EF3 be relocated to the southwest corner of the site as they state that the current location of EF3 is inaccessible. The RD provides for the relocation of EF3.

Waste Licence W0197-01 specified daily monitoring for COD, weekly monitoring for BOD and monthly monitoring for suspended solids, oils, fats and greases and diesel range organics. On the 29<sup>th</sup> March 2007 the OEE granted a request to reduce the frequency of the monitoring of emissions to sewer to annual monitoring. The RD retains the original monitoring frequencies outlined in the current licence (W0197-01). This was agreed with Westmeath County Council under Section 52 of the Waste Management Acts 1996 to 2008 at the time of issuing the current licence (W0197-01). The monitoring frequencies are being retained due to the additional process of depolluting ELVs on the site.

### **Emissions to Surface Waters**

There are no proposed discharges of process emissions to surface waters.

### **Emissions to ground/groundwater**

There are no emissions to ground from the facility and there are no proposed emissions to ground for the future. There are no boreholes on site and the facility is serviced by a water main.

The RD requires that all storage areas on-site shall be bunded and impervious to the materials stored within. The proposed depollution shed, as well as having an impermeable concrete surface, will have a sealed drainage infrastructure. The building will be sealed to prevent any spillages from leaving the building and entering the site drainage system. The RD specifies that the activity of depolluting end-of-life vehicles shall not commence on site until all the appropriate infrastructure is in place (Condition 3.26).

All storage tanks, drums and containers used for the storage of fluid will be stored within a bunded area with impermeable surfaces.

### **Wastes Generated**

All waste arising from the operation of the facility will be recovered where possible. All other wastes will be disposed of off-site.

### **Noise**

In accordance with the current waste licence (W0197-01) Wallace Recycling Limited carried out noise surveys in 2005 and 2006. These surveys concluded that the facility was in compliance with the requirements of the licence.

As outlined above, the airbags of the ELVs have to be deployed prior to metal recycling. There is the potential for noise during the deployment of the airbags. It is proposed that the airbags will be deployed in-situ (in the vehicle) and within the depollution shed. The level of noise generated during the deployment of airbags is unknown by the suppliers of the deployment equipment. Wallace Recycling Limited therefore proposes to assess the noise levels upon commencement of deployment and if noise reduction measures are required the following options can be considered; use of a purpose 'blanket' which is placed over the car during deployment, use of soundproofing in the depollution shed and deployment in a soundproof unit. Condition 8.13 requires appropriate noise screening to be provided in the depollution shed.

The RD specifies noise monitoring to be carried out at the facility. The emission limit values are to be measured at the noise sensitive locations specified in Schedule C.

### **Nuisance**

Condition 5.5 of the RD specifies that measures be put in place to ensure vermin, birds, flies, mud, dust and litter do not impair the environment at the facility or beyond the facility boundary.

Schedule B sets out the dust deposition rates and Schedule C list the monitoring requirements for dust monitoring.

### **Cultural Heritage, Habitats & Protected Species**

The proposed development is not located within any designated area. The nearest designated site is the Royal Canal (pNHA), approximately 80.5 metres away. Due to the nature of the activities carried on at this site, it is unlikely to cause any risk to any protected area.

### **Waste Management Plan**

The Waste Management Plan for the Midlands Region, 2005 - 2010 has been considered during the assessment of this application for a review of the waste licence.

### **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.

### **Compliance with Directives/Regulations**

The facility does not fall under the scope of the landfill or IPPC Directives. The facility will have no direct emissions to groundwater or to surface waters.

### **Compliance Record**

An audit of the facility was carried out in November 2008. On the day it was found that the facility was in a poor condition in terms of housekeeping, waste storage and record keeping. It was also found the waste transfer building was not fully enclosed. A follow up inspection found a reoccurrence of some of these issues.

The OEE sent an inspection report to Wallace Recycling Limited outlining the issues on site. Wallace Recycling Limited sent a response to the Agency on the 25 June 2009 outlining the actions that they have undertaken to ensure compliance with the licence. In the response Wallace Recycling Limited stated that they have cleaned all the waste that was being stored outside the materials recycling building. They have also concreted all appropriate surfaces at the facility. Records on site are in the process of being appropriately categorised.

The RD specifies that from the date of grant of this licence the waste transfer building shall be fully enclosed. The RD also specifies that the activity of depolluting end-of-life vehicles shall not commence on site until all the appropriate infrastructure is in place.

## **Complaints**

Over the past three years there have been ten complaints in relation to odour made against Wallace Recycling Limited. As outlined above they have a number of measures in place to reduce odour emissions. These include rejecting highly odorous wastes, and all wastes being tipped, handled and stored inside an enclosed building.

As outlined above the RD specifies that the licensee shall undertake, within six months of date of grant of this licence and as required by the Agency, an odour assessment which shall include as a minimum the identification and quantification of all significant odour sources and an assessment of the suitability and adequacy of the odour abatement system to deal with these emissions (Condition 6.17).

The process of end-of-life vehicle depollution will not give rise to odour emissions from the facility.

## **Fit & Proper Person Assessment**

The legal, technical and financial standing of the applicant qualifies them to be considered Fit and Proper Persons.

## **Proposed Decision**

I am satisfied that the conditions as set out in the RD will adequately address all emissions from the facility and will ensure that the carrying on of the activities in accordance with the conditions will not cause environmental pollution.

## **Charges**


The charge for 2009 as calculated by the OEE is €11,360. The RD has retained this charge as no significant increase in enforcement is expected as a result of this review.

## **Recommendation**

In preparing this report and the Recommended Decision I have consulted with Agency technical and sectoral advisor Mr. Brian Meaney and I have also consulted with the enforcement inspector for this site, Mr. John Gibbons.

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 PD and for the reasons as drafted.

Signed

  
Yvonne Furlong  
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 1996-2007.*