

This Report has been cleared
for submission to the Director by
Programme Manager Frank Clinton.
Signed Joe Reilly Date 10/11/10



LICENSING &
RESOURCE USE

MEMO ON TECHNICAL AMENDMENT OF A WASTE LICENCE

To:	Director
FROM:	Marie O'Connor/Stuart Huskisson Environmental Licensing Programme
DATE:	10 November 2010
RE:	Technical Amendment of a Waste Licence from McGill Environmental Systems (Ireland) Limited, Coom, Carrignavar/Glenville, County Cork. (Reg. No. W0180-01).

1. Introduction

McGill Environmental Systems (Ireland) Ltd was granted a waste licence (Reg. No. W0180-01) on 17th February 2004 to operate an indoor composting facility accepting non-hazardous biodegradable wastes- primarily sewage sludge, industrial sludges, household and commercial waste.

The quantity of wastes to be accepted is limited to 20,800 tonnes per annum (~400 tonnes/week). Schedule A of the licence limits the wastes accepted to Category 3 biodegradable household and commercial waste that has been source separated and separately collected.

2. Technical Amendment Request

McGill Environmental Systems (Ireland) Ltd submitted a technical amendment request on 17th August 2010 to allow for the acceptance of municipal waste that has undergone mechanical treatment (organic fines) at another facility. Greenstar have obtained a contract from Cork County Council to deal with organic fines and Greenstar have requested McGill to biologically stabilise them.

McGill included a letter (dated 27th July 2010) from Department of Agriculture, Fisheries and Food (DAFF) stating that the application to treat animal by-products at the facility was approved in principle and subject to the completion of a Validation Report and compliance with a document entitled 'Conditions for approval and operation of composting plants treating animal by-products in Ireland'. The current version on the DAFF website is dated 27 March 2009.

The resultant biologically stabilised waste is to be sent to landfill.

3. Consultation with the Office of Environmental Enforcement (OEE)

I have received advice from the ELP sectoral experts in relation to updated conditions and schedules for composting facilities. The OEE inspector for the facility advised that the proposed changes cannot be accommodated under the existing licence.

4. Compliance

The OEE Inspector indicated that since the operation commenced operations in Dec 2008 there have been nine odour complaints; 4 in 2009 and 5 this year so far. No non-compliances have been issued by the Agency in relation to odour.

Two non-compliances were noted during a site inspection last year, and a NONC issued - these concerned materials handling on site and record keeping.

5. Assessment

Amendment A, as proposed, includes the following Glossary, Condition and Schedule amendments:

- For clarity the Glossary is amended to include terms for composting, mechanical/biological treatment, organic fines, separate collection and stabilised biowaste.
- The revised Condition 1.3 will allow for the acceptance of organic fines to produce stabilised biowaste.
- Revise Condition 1.4 to clarify the requirements in relation to waste collection permits for the transport of the wastes.
- Condition 5.2.1 states that the biodegradable waste must be put into the composting container within 60 hours of receipt but the more up to date requirements are within 12 hours of receipt. The DAFF guidance document recommends that the transformation of animal by-products should begin within 24 hours of receipt. The condition should be amended to reflect this.
- Condition 5.2.6 should be amended to allow for the organic fines to be accepted for treatment at the facility.
- Condition 5.6 should be amended to take account of the acceptance and treatment of organic fines. The condition also requires proposed outlet sites for stabilised biowaste to be submitted in advance to the Agency for agreement and for records of the quantity of biowaste produced per annum to be maintained.
- Condition 5.11 and Condition 5.12 should be inserted to ensure that organic fines and separately collected organic waste are stored, processed and composted in separate areas and that no mixing of these two waste streams takes place.
- Note 2 in *Schedule A: Waste Acceptance* should be amended to allow for the acceptance of organic fines from mechanical treatment of waste.
- *Schedule H: Compost Use* should be renamed and amended to take account of the production of stabilized biowaste and updated guidance on composting requirements. Amended *Schedule H: Standards for Compost Quality*, maintains the provision for the Agency to agree amendments of the compost quality standards.

Condition 5.4 of the licence requires that any written procedures are updated to reflect the acceptance of new wastes and this should be done by the licensee prior to the acceptance of the organic fines.

6. IPPC Directive requirements

Annex I of the IPPC Directive (2008/1/EC) lists the installations that are required to comply with the Directive. This facility falls under Category 5.3 *Installations for the disposal of non-hazardous waste as defined in Annex IIA to Directive 2006/12/EC under headings D8 and D9, with a capacity exceeding 50 tonnes per day*. The Technical Amendment includes those changes which are required to bring the licence into compliance with the requirements of the Directive.

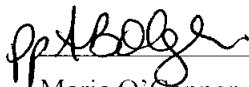
- Glossary – Add definition of BAT and Incident
- Conditions – Add Resource Use and Energy Efficiency; Accident Prevention and Emergency Response; Closure, Restoration and Aftercare Management

Following consideration of the above, it is considered that the licence can be technically amended by the exercise of the powers conferred by Section 42B(1)(b) and (c) of the Waste

Management Acts 1996 to 2010, i.e., the amendments will not result in the relevant requirements of Section 40(4) ceasing to be satisfied and Section 76(4) of the Waste Management Acts 1996 to 2010.

Recommendation

I recommend that the Technical Amendment (Amendment A) be issued under 42B(1) of the Waste Management Acts 1996 to 2010, subject to the conditions and for the reasons as drafted.



Marie O'Connor
Senior Inspector
Environmental Licensing Programme

