



This report has been cleared for Submission to the Board by the Programme Manager

Frank Clinton

Signed: *Frank Clinton*

Date: *1/12/10*

LICENSING AND RESOURCE USE

ADDENDUM TO INSPECTORS REPORT ON A LICENCE APPLICATION

TO:	DIRECTORS	
FROM:	Brian Meaney	- Licensing Unit
DATE:	1 st December 2010	
RE:	Application for a waste licence review from CAVAN COUNTY COUNCIL in relation to the Corranure Landfill Licence Register Number W0077-04	

Application Details	
Type of facility:	Non-hazardous landfill and civic amenity site
Classes of Activity: (P = principal activity)	3rd Schedule: Classes 1, 4, 5[P], 7, 11, 12, 13 4th Schedule: Classes 2, 3, 4, 9, 11, 12, 13
Category of Activity under IPPC Directive (2008/1/EC):	5.4
Quantity of waste managed per annum:	90,000 tonnes per annum (existing licence) 45,000 tonnes per annum (proposed)
Location of facility:	Lismagratty and Corranure Townlands, Cootehill Road, Cavan.
Licence application received:	22 September 2008
EIS Required:	No
Submissions:	4 (plus 141 on the Oxigen Environmental Ltd application W0248-01)
Site Inspection:	11 November 2009

1. Facility and background to this report

Corranure landfill and civic amenity site is an existing facility, currently authorised to accept up to 90,000 tonnes of waste, principally for landfilling. The licence is in the name of Cavan County Council but the facility has been operated since 2007 by

Oxigen Environmental Ltd under a concessionary agreement with the Council. The facility is comprised of four full landfill cells – called cells 0, 1, 2 and 3. The first three cells have been capped in accordance with the existing licence. Cell 3 was filled in March 2010 and temporarily capped in April 2010. A final cap will be applied no later than 2012 in accordance with **condition 10.2** of the RD (this is also a requirement of the existing licence). A further cell, cell 4, is being constructed at present and this construction work was agreed with the Agency as specified engineering works (SEW) under the existing licence. No approval has been granted to date by the Agency for filling cell 4 with waste.

In September 2008, Cavan County Council applied for a review of the waste licence (register number W0077-03) for the purpose of disclaiming their responsibility and liability for the operational cells 3 and 4, associated landfill infrastructure and certain land under its ownership at the facility. Under a contract for sale agreement, these cells, infrastructure and land are to be sold to Oxigen Environmental Ltd along with the civic amenity site and all associated landfill infrastructure such as leachate and landfill gas management equipment.

In parallel, and also in September 2008, Oxigen Environmental Ltd made an application for a new waste licence (register number W0248-01) with a proposal to take responsibility and ownership of cells 3 and 4, associated lands, the civic amenity site and landfill infrastructure. Oxigen also proposed to establish a materials recovery facility and a biological treatment facility as new developments.

The application was discussed at a meeting of the Board of the Environmental Protection Agency on 2 November 2010. Following that discussion I was asked to provide an Addendum to the Inspector's Report, clarifying certain matters, and on foot of the discussion to make some changes to the Recommended Decision. The amended Recommended Decision would:

- retain Cavan County Council's responsibility as licensee for the entire facility; and
- consider other issues regarding the landfilling of waste and control of emissions at the facility.

These matters are discussed in this report and presented in the accompanying Recommended Decision (RD) for a reviewed licence for Cavan County Council, register number W0077-04.

The Recommended Decision is constructed as a new licence (as opposed to an amendment of the existing licence) and is an amalgam, primarily of the licence that had been recommended for Oxigen Environmental Ltd (W0248-01) prior to the Board meeting of 2nd November, and secondarily the existing licence (W0077-03). Any condition or text that is already in W0077-03 is *not* highlighted in the RD.

2. Retention of Cavan County Council as licensee for the entire facility

The RD accompanying this report is a proposal for a reviewed licence as replacement for the existing licence register number W0077-03. The RD is addressed to Cavan County Council and will control and regulate the activities at the entire site – that is, all landfill cells (0, 1, 2, 3 and 4), associated landfill infrastructure and the civic amenity site. The RD does not propose authorisation for materials recovery and

biological treatment facilities proposed by Oxigen Environmental Ltd. These items of infrastructure were not sought by Cavan County Council.

Condition 12.5 of the RD proposes the establishment of a community fund to be paid for by a charge on waste accepted for disposal at the landfill.

3. Operational Description and New Controls

Landfill – depth of waste and temporary capping

As described above, four landfill cells have been filled at the facility to date (cells 0, 1, 2 and 3). A fifth cell, cell 4, is being constructed. The design of cell 4 shows a proposed depth of waste of over 30 metres. Given the history of uncontrolled odour emissions during filling of earlier cells, with evidence pointing to the 30m depth of waste being a major contributory factor, the risk of a recurrence of odour emissions during filling of cell 4 is not acceptable. **Condition 3.4.3** of the RD proposes limiting the depth of waste in cell 4 to 15 metres. Depending on how cell 4 is filled, I estimate that the depth restriction will reduce available void space in cell 4¹ by 30-50%. It is apparent that deep deposition of waste can cause problems in that waste will be deposited on the same footprint for a prolonged period thus delaying provision of completed gas management systems and capping. Also, increased height means more lateral deposition of waste (greater footprint) to provide appropriate and stable slopes – resulting in large and spread out waste bodies, again delaying the finalisation of gas management and capping infrastructure. All the while, landfill gas is generated that, if not captured, is released into the atmosphere as a fugitive emission. Consultation with Dr Jonathan Derham of the EPA’s Office of Climate, Licensing and Resource Use would suggest that 30 metres depth of waste is not excessive in an international context². However the operators at Corranure landfill have demonstrated an inability to manage landfill gas associated with the depth of waste currently authorised at the landfill. Regardless of waste depth, it is important (according to RPS in a filling plan for cell 4 prepared in January 2010 for Cavan County Council) that waste should be capped no later than 12 months from initial deposition, and this would equally apply at any landfill, regardless of final depth. **Condition 3.4.2(i)** of the RD proposes that no waste is left exposed for more than 10 months without temporary cover and a gas barrier membrane.

¹ Currently estimated by RPS (January 2010) for Cavan County Council at 374,000m³, equivalent to approximately 300,000 tonnes of waste.

² For example, according to Olivier et al.: “in a context of high demand for dumping space and fewer available sites, European ... landfills are ... progressively being designed on the basis of greater depth.” The following examples are cited: A quarry at Espira-de-l’Agly, France, will be filled to 40-60m depth over 23 years; At Woodlawn, Australia, 500,000 tonnes per annum of Sydney’s waste will be deposited in a landfill that will be 200m deep upon completion; At Ferques, France, waste will be deposited to a depth of 76m, in lifts of 10m, with cells to be filled in 2-2½ months at a rate of 800 tonnes per day. Cells at Ferques will be temporarily capped using low permeability woven polyethylene. Information from:

- Olivier et al., *Predicting the Storage Capacity of Deep Landfills: Ferques Bioreactor Case Study*, Proceedings Sardinia 2005, Tenth International Waste Management and Landfill Symposium, Sardinia, October 2005; and
- www.globalmethane.org

Rate of intake of waste at landfill

It is apparent from consultation with Mr Kealan Reynolds of the Office of Environmental Enforcement and the EPA's complaints database that the uncontrolled emissions of odorous landfill gas (as evidenced by odour complaints) commenced with the intensification of activities at the landfill in late 2005 – following authorisation in May 2005 to increase intake at the landfill to 90,000 tonnes of waste per annum (from 30,050 tonnes per annum)¹. It is therefore proposed in ***Schedule A: Limitations*** of the RD to limit intake for disposal at the landfill to 45,000 tonnes per annum (half the current intake). This limit is chosen arbitrarily but is equivalent to approximately one-half the quantity of household mixed residual (black bin) waste collected in the North-East waste management region in 2008 (approximately 90,500 tonnes)².

Table 1 quantifies landfilling in the North-East region in 2008 – as reported by the Agency in the *National Waste Report 2008*. The table shows Corranure to be an important element in the landfill infrastructure of the North-East. The Regional Waste Management Plan envisages closure of the Corranure landfill in 2010/11 – based on void capacity at their time of writing and a waste intake of 90,000 tonnes per annum. The Plan is otherwise silent on the region's intentions regarding Corranure landfill beyond the current licensed capacity (as per W0077-03). I note that Corranure landfill has accepted no waste for disposal since March 2010.

The proposal to limit waste intake to 45,000 tonnes per annum will mean a *minimum* lifespan for cell 4 of three to four years, equating to a probable intake of 35,000-45,000 tonnes per sub-cell.

Table 1 Landfilling in the North-East Region, 2008 (tonnes)

An additional 154,060 tonnes of waste recovered at these facilities is not itemised in the table. The data is not to infer that this waste was generated in the North-East region.

Landfill	Licensee	Household waste	Commercial waste	Industrial & other waste	Total waste disposal
Corranure	Cavan County Council	67,051	16,845	3,494	87,390
Whiteriver	Louth County Council	17,920	58,972	7,006	83,898
Knockharley	Greenstar	23,127	101,525	9,107	133,759
Total		108,098	177,342	19,607	305,047

¹ I note that the licence review for W0077-02, in which the rate of intake of 90,000 tonnes per annum was granted, attracted only three submissions from third parties (two of which are public authorities). The PD attracted one third party objection from a private individual – the objection made reference to obnoxious odours.

² National Waste Report 2008, EPA.

Civic amenity site

The civic amenity site accepts a normal range of household recyclable waste as well as black bag waste for disposal. There are no significant changes proposed in the regulation of the civic amenity site proposed in the RD except for the following:

Condition 1.7.2 proposes extended opening hours at the civic amenity site to better facilitate public access to the facility. **Condition 8.2.17** allows the licensee to expand its hazardous waste collection service to include sources other than households. This is a general recommendation of the National Hazardous Waste Management Plan 2008-2012 and the condition also requires the licensee to take account of any guidance published under the Plan.

4. Emissions to atmosphere

Odour has been an issue of considerable concern at this facility for some years and is the principal issue identified by local residents in submissions. The RD proposes a number of measures to address the uncontrolled emissions of odour from the facility, in addition to those mentioned above:

- an experienced site manager and deputy manager are employed [**condition 2.1.1**];
- a network of horizontal gas wells to be installed at each 3m depth of waste [**condition 3.16.2**];
- a prohibition on the acceptance of organic fines from the mechanical treatment of waste for disposal in the landfill [**condition 8.2.11**]; and
- a prohibition on the acceptance of recyclable waste of a biodegradable nature such as paper, cardboard and wood for disposal in the landfill [**condition 8.2.12**].

Off-site migration of landfill gas is monitored at perimeter boreholes. The trigger levels for off-site gas migration in the existing licence are 1% v/v for methane and 1.5% v/v for carbon dioxide. The annual environmental report for 2009 (for waste licence W0077-02) states that methane levels were exceeded in perimeter borehole G01 in July and August 2009 but all other monitoring results during the reporting period were within the 1% v/v limit. Carbon dioxide levels were exceeded during the reporting period on a number of occasions at boreholes G01, G05 and G06 with values of up to 9.2% v/v recorded.

There are two 1500m³/hr flares at the facility burning gas from all cells. The concentration of methane (CH₄), carbon dioxide (CO₂) and oxygen (O₂) as well as temperature and flow are continuously monitored through the SCADA system. **Schedule B.1.1** of the RD proposes emission limit values at the flare and utilisation plant (not yet installed). **Condition 3.16.8** requires submission of a feasibility study for a gas utilisation plant.

Ambient dust monitoring is proposed in the RD [**Schedule C.6**] and **condition 5.3** requires attention to be paid to potential dust emissions.

5. Emissions to Sewer

The leachate storage tank is connected to the existing foul sewer via a rising main that discharges at emission point SE1. The sewer connects the landfill to Cavan County Council's Waste Water Treatment Plant at Cavan Town.

Cavan waste water treatment plant is a conventional activated sludge plant which provides preliminary and secondary treatment with phosphate removal. It was granted a licence (register number D0020-01) by the Agency in July 2010. It has a design capacity of 22,000 population equivalent (p.e.). The population equivalent of the Cavan agglomeration is reported as 13,850¹. The leachate load is equivalent to approximately 700 p.e. and 63% of the ammonia load entering the treatment plant. Ammonia concentrations in the final effluent to the Cavan River were reported by Cavan County Council as at an average of 14.7 mg/l in 2007. The upgrade of the Cavan sewerage scheme is included in the Water Services Investment Programme 2010-2012.

Cavan County Council consented to a sewer discharge being made by Oxigen Environmental Ltd under Section 52 of the Waste Management Acts 1996 to 2010 subject to emission limit values and additional conditions. These emission limit values are included in the RD as **Schedule B.3** of the RD. Additional conditions over and above the standard conditions for sewer discharge are included in **condition 5.5**.

Condition 6.17.9 of the RD requires the licensee to examine the feasibility of providing leachate treatment capacity at the facility.

6. Emissions to Surface Water

The Corranure landfill is in the north western river basin district and the catchment area of the Annalee River to the north and the Cavan River to the south-west. The facility is drained by the Lismagratty stream, a tributary of the Annalee River and the Corranure stream, a tributary of the Cavan River. There are no process emissions from this facility to surface waters. Surface water run-off is controlled by grit traps and oil/water separators and **condition 3.24** continues the obligation to control run-off in this way. **Condition 3.31** imposes a general obligation to maintain effective surface water management infrastructure.

Elevated ammonia levels have been detected at emission point SW2 (to the Lismagratty Stream). Consequently, and in order to meet the environmental quality standard of the European Communities Environmental Objective (Surface Waters) Regulations 2009, the RD has specified in **Schedule B.2 Emissions to Surface Water** an emission limit value of 0.14mg N/l at emission point reference numbers SW1 and SW2.

Both the Annalee and Cavan Rivers are classified at risk of not achieving good status. The overall objective for both rivers is 'restore'. The Annalee River has an overall status of 'poor' and the Cavan River has an overall status of 'moderate'. This must improve to 'good' status by 2015 in order to comply with the Water Framework

¹ *Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons - A Report for the Years 2006 and 2007*, EPA, 2009.

Directive (WFD). The final draft *North Western River Basin Management Plan* (April 2010) looks to restore water quality in the Cavan River to good status by 2021 on an extended 6 year time scale.

Ambient surface water monitoring is proposed in the RD [*Schedule C.8 Receiving Water Monitoring*] both upstream and downstream of the site. Sediment sampling is also proposed for the Corranure and Lismagratty streams. The proposed monitoring points are the same as in the existing licence.

7. Emissions to ground/groundwater:

Under the existing licence (W0077-03) there are eight groundwater monitoring locations and nine private well monitoring locations specified. The applicant has stated that all wells within 500m of the boundary of the landfill are monitored.

BHP were contracted by Cavan County Council to carry out environmental monitoring at the Corranure Landfill site. The BHP report *Annual Report covering Groundwater, Surface Water and Private Well Monitoring at Corranure Landfill* covered the monitoring carried out in the second quarter of 2008. The applicant highlighted that this report found coliforms GW01 (located up gradient of the landfill), SA01 (junction of Cell 2 and Cell 3), GW04 and GW05 (both points located north of the site). Faecal coliforms were found at GW04. No elevated levels of List I/II organics were found or any heavy metal concentrations at these locations. Three private wells showed evidence of microbial contamination exhibiting the presence of low levels of coliform bacteria. All waters were clear and odourless and free from synthetic organic and heavy metal concentrations.

In the AER for 2009, Cavan County Council gave the following summary of the quarterly monitoring reports for 2009:

- Groundwater levels remained fairly constant throughout the year.
- At the groundwater monitoring points monitored (GW01, GW04, GW05) coliform bacteria were detected but were free from synthetic organic and heavy metal concentrations. Chloride levels were in all locations found to be typical of natural levels in rivers and other fresh waters.
- During the year all waters were clear and odourless except for well locations PW7 and PW02, which were turbid in colour in quarter 4. Levels of chloride varied throughout the year with elevated concentrations at PW07 in quarter 1 and 4 (48.2mg/l and 150mg/l), PW10 quarter 1 (66mg/l), PW05BT (64.3mg/l, 45.2mg/l and 47.5mg/l) and at PW11 in quarter 3 (50.2mg/l). All locations were free from microbial contaminations except PW02, PW05BT, PW07, PW09 and PW13, which exhibited low levels of coliform bacteria.
- Overall, with the exception of elevated levels of coliforms at some of the locations and some locally high concentrations in chloride, the quality of the water met the criteria as outlined in the European Communities (Drinking Water) (No. 2) Regulations, 2007.

Condition 5.7.2 requires the maintenance of trigger levels for groundwater contamination. *Schedule C.7 Groundwater Monitoring* proposes considerable monitoring obligations on the licensee.

8. Wastes Generated

The civic amenity site provides for the recovery of a wide range of recyclable materials. Mixed waste for disposal is also accepted. The materials from the civic amenity site are processed, recycled, composted and/or disposed of as necessary.

9. Noise:

Condition 6.13 and *Schedule C.5* requires quarterly noise monitoring at and around the facility. The noise limit values are to apply at noise sensitive locations.

10. Nuisance:

Nuisances at a facility of this nature can include litter, dust, mud, odour, vermin, birds and flies. There have been a large number of submissions by local residents and the Cavan Better Waste Management Group (CBWMG) regarding nuisances. The nuisance controls for the facility include conditions controlling interference with amenities, nuisance emissions including litter, dust and odour.

11. Use of Resources

The main requirements for fuel at the facility are road diesel, marked gas oils, central heating oil and natural gas. **Condition 7** of the RD requires an energy audit to be completed within six months of the date of grant of licence and deals with energy efficiency at the facility. **Condition 7** also proposes water harvesting as a means of reducing treated water usage at the facility.

12. Restoration, aftercare and financial provision

Cell 3 was completed in March 2010 and will be capped within two years in accordance with the existing licence or a new licence if granted. Finished cells are to be capped with a low permeability capping system which will prevent the uncontrolled escape of landfill gas and the infiltration of rainfall into the waste body. On final capping, Cavan County Council have proposed that the site will be allowed to become colonised with natural species. On completion of landfill operations an aftercare and monitoring programme will be put in place.

Condition 10 of the RD specifies finishing and capping requirements and stipulates measures for closure, restoration and aftercare of the site. **Condition 10.7** of the RD proposes that a closure, restoration and aftercare management plan (CRAMP) be prepared within six months that encompasses the entire facility. **Condition 12.3** of the RD proposes that environmental liabilities and financial provision are addressed within 12 months.

13. Cultural Heritage, Habitats & Protected Species

The closest designated sites to the facility are:

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- Drumkeen House Woodland Natural Heritage Area (NHA) (Site Code 000980), located 2.8km to the west of the facility;
 - Lough Oughter and Associated Loughs Special Area of Conservation (SAC)/NHA (Site Code 000007), 4km to the west; and
 - Lough Oughter Special Protection Area (SPA) (Site Code 004049), also 4km to the west.

All surface water will be collected by surface water drains connected to the drainage layer within the capping system, surface water run-off shall be diverted to a silt trap and an oil interceptor prior to discharge from the facility. The quality of the surface water will be monitored in accordance with the RD and is expected to be uncontaminated and have no impact on surface water quality.

When operated in accordance with the RD, there should be no environmental emissions from the facility that would give rise to adverse effects on these or any other designated sites.

14. Waste Management, Air Quality and Water Quality Management Plans

The *Waste Management Plan for the North East Region 2005-2010* has identified that the North East Region will strive to implement a regional approach to waste management that is sustainable and based on National and EU legislation and policy. The integrated waste management approach based on the EU waste hierarchy will be applied to waste generated, implementing maximum recycling, recovery of energy from residual waste, and minimising landfill disposal. The Region will continue to improve the infrastructure for recycling and recovery of waste and will maximise positive input of the private sector to help meet Plan objectives. As outlined above, the Plan is unspecific on the role to be played by Corranure landfill in the period after 2010.

15. Compliance with Directives/Regulations

The Recommended Decision takes account of the requirements of the following Directives/Regulations:

Landfill Directive

The RD conditions have been specified in line with the Landfill Directive and with the principles of Best Available Techniques (BAT).

IPPC Directive

This installation falls within the scope of Category 5.4 (*Landfills receiving more than 10 tonnes per day or with a total capacity exceeding 25,000 tonnes, excluding landfills of inert waste*) of Annex I of Council Directive 2008/1/EC concerning integrated pollution prevention and control (codified version). The RD, as drafted, takes account of the requirements of the Directive, which was transposed into Irish law by the Protection of the Environment Act 2003. In particular, **Condition 7** provides conditions dealing with water, energy and raw materials use, reduction and efficiency on-site. **Condition 9** addresses accident prevention and emergency response, and **Condition 10** provides for measures to be taken in the event of definitive cessation of the activity.

Water Framework Directive [2000/60/EC]

The conditions included in the RD have been developed to prevent any significant impact on water quality from the facility, and in particular surface water and groundwater quality. Emission limit values are imposed to ensure there is no contamination of waters. Substantial monitoring of water quality is required to detect any impact and to allow mitigation measures to be put in place as soon as possible.

Environmental Liabilities Directive (2004/35/EC)

The facility is within scope of the Environmental Liability Directive. The existing licence (W0077-03) requires the preparation of an environmental liabilities risk assessment and making of financial provision against potential environmental liabilities. These measures will be carried forward into the new licence if granted. The RD generally imposes a preventive approach to environmental protection and requires that any environmental incidents (as defined in the RD) are reported to the Agency.

Habitats Directive (92/43/EC) & Birds Directive (79/409/EEC)

Several protected areas lie within 5km of Corranure landfill site. Water discharges are ultimately to the Cavan and Annalee Rivers which flow to the Erne River. Air emissions are to be controlled according to emission limit values. There are no permitted discharges to groundwater. The activity and its emissions are not predicted to negatively impact on protected sites.

16. Cross Office Liaison

In preparing this report on foot of the Board's instruction, I have consulted with Dr Jonathan Derham of the Office of Climate, Licensing and Resource Use and have further consulted with the inspector for the facility, Mr Kealan Reynolds of the Office of Environmental Enforcement.

17. 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.

18. Compliance Record

The Agency has had two successful district court prosecutions, in 2005 and 2007, against Cavan County Council in relation to breaches of the waste licence for Corranure Landfill. The licence breaches of 2005 included failure to install an active landfill gas collection and flaring system, inadequate management of leachate from the landfill and exceedance of allowable leachate levels. The offences pertaining to the 2007 prosecution included causing an odour nuisance in the immediate area of the facility, failing to provide and maintain leachate and surface water management

infrastructure and failing to provide and maintain landfill gas infrastructure at the facility. A file has been submitted to the DPP for its consideration regarding the current operation and management of Corranure landfill.

Odour nuisance is the main issue highlighted by inspections, site visits and complaints received by the OEE. It has been noted that the number of odour complaints has dramatically decreased since the completion of the temporary capping of cell 3.

I have discussed with the OEE inspector for the facility the poor compliance of the facility with the existing licence and the apparent inability of the operators (both Cavan County Council and Oxigen Environmental Ltd) to control odour emissions and the reasonable expectation of neighbours that odours would be managed and eliminated.

19. Fit & Proper Person Assessment

The legal, technical and financial standing of the applicant qualifies them to be considered fit and proper persons. Having said that, the poor history of compliance at the facility, and in particular the response to repeated odour complaints, has been linked to the failure of the applicant to retain an experienced landfill manager at the facility. The RD in **condition 2.1.1** proposes that an experienced facility manager be appointed and that that person have a minimum of five years experience in a similar role.

20. Complaints

A total of 194 complaints were made to the EPA to end-July 2010 – summarised in the table below. All but one complaint related to odour. Some five complaints were made to the licensee regarding odour in 2010 (in July).

Month (2010)	No. of complaints
January	54
February	71
March	43
April	12
May	4
June	5
July	5
Total Jan-Jul	194

21. Proposed Decision

I am satisfied that subject to compliance with the conditions of the Recommended Decision, the development and operation of the facility as proposed by the applicant will not cause environmental pollution. As an alternative approach to that which I originally recommended, I recommend granting the licence as proposed.

22. Submissions

I dealt with all submissions received in relation to this application and the associated application from Oxigen Environmental Ltd (W0248-01) in my earlier report.

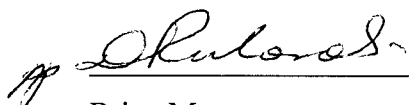
23. Charges

The RD recommends an annual charge of €29,442, the same charge as was levied by OEE in 2010 under the existing licence.

24. Recommendation

I have considered all the documentation submitted in relation to this application and the associated application by Oxigen Environmental Ltd (W0248-01) 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



Brian Meaney

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 1996-2010.