



OFFICE OF CLIMATE,
LICENSING & RESOURCE
USE

ENVIRONMENTAL LICENSING PROGRAMME MEMORANDUM

TO: LAURA BURKE, DIRECTOR

C.C: Frank Clinton, Programme Manager

FROM: Caroline Connell, Inspector

DATE: 5th January 2011

RE: Request for a Technical Amendment to Waste Licence Register Number **W0163-01**, held by **Bergin Waste Disposal Limited** in relation to a waste facility at **Ballaghaderreen Industrial Estate, Ballaghaderreen, County Roscommon.**

Introduction

Bergin Waste Disposal Ltd., operates a waste transfer station and recycling facility at Ballaghaderreen Industrial Estate, Ballaghaderreen, Co. Roscommon. Bergin Waste Disposal Limited is licensed to accept a maximum of 19,700 tonnes/annum of non-hazardous waste at this facility including household, commercial, industrial and construction and demolition waste. No hazardous or liquid wastes may be accepted at the facility. The licence stipulates that all waste processing must be carried out indoors. This licence also provides for the installation and operation of a Civic Waste Facility at the facility.

The facility was originally licensed on the 24th May 2002. The licence was technically amended on the 24th May 2006 to allow minor amendments to the terms of the existing waste licence so as to provide for extension of the licensed facility boundary.

Details of Request for Technical Amendment

The licensee has requested a technical amendment of waste licence, Register No. W0163-01, under Section 42B of the Waste Management Acts 1996 to 2010.

On the 28th April 2010 the Office of Environmental Enforcement (OEE) received correspondence from Mr. Campbell Finnie (Facility Manager), on behalf of Bergin Waste Disposal Ltd., stating that:

1. Due to the growth of the business there is a need to relocate the wood shredding activity in order to optimise processing capacity.
 - o It is proposed to relocate the wood shredder to the north side of the facility on the concrete hard standing area within the new extended area of the facility which was approved by technical amendment of the

- licence on the 24th May 2006. The wood shredder will be operated approximately once a week.
- Drainage from this hard-standing area will be diverted to the foul water system.
2. In addition to wood shredding the licensee proposes to use this area for temporary storage of waste prior to its sorting within the waste recycling facility itself.
- The material to be stored will be contained in skips or bins and in most cases covered. It is proposed that no material in this area with the exception of timber will be stored on the ground and that all storage is temporary.

OEE Consultation

I have received correspondence from the Office of Environmental Enforcement confirming:

- Conditions 5.1 and 5.11 control where the waste processing operations can be undertaken.
 - Condition 5.1 *“All waste processing shall be carried out **inside** the waste transfer building”*.
 - Condition 5.11 *“The north-eastern area outlined in blue on the Ordnance Survey Map Extract dated 20/11/2000 (scale 1:2500) submitted as part of the technical amendment application received on 13/04/06 shall be used only for the parking of empty vehicles and storage of empty skips, or as otherwise approved in writing by the Agency. **No waste shall be processed or stored in this area**”*.
- Due to the size of the wood shredder the shredding operation occurs in the yard area at present. This is an occasional activity and requires the accumulation of sufficient wood for the shredder to come on-site.
- Due to the size of the original facility footprint, the yard area can get quite restricted when additional waste throughput is required and the timber is being temporarily stored prior to processing in this area.
- The proposed amendment to the existing operating procedure is to have a more streamlined waste wood handling and processing procedure for the facility. This would free up yard space for the movement of trucks and waste handling machinery in the yard area.
- No complaints in relation to this facility have been received by the Agency.
- Compliance with the licence is generally good for this facility.
- Existing conditions within the waste licence will provide control for dust and noise emissions from the proposed shredding operation.
- The OEE recommend *“...that the licence is amended to accommodate the above”*.

Discussion

1. Relocation of the wood shredding activity from the original licence area to within the area of the facility extension:

The 2008 AER confirms that a wood shredder was purchased in early 2008. The OEE confirmed that due to the size of the wood shredder it is operated outside in the yard area and that it is used approximately once a week.

The licensee proposes to relocate the wood shredder to the north side of the facility on the concrete hard standing area within the new extended area of the facility. See Appendix 1 for a map of the facility and emission monitoring points.

Waste water:

The applicant has confirmed that drainage from the hard-standing area is diverted to the foul water system. *Schedule D.1, Table D.1.1* of the licence currently specifies a monitoring location (FW-1) for waste water emissions. Condition 3.11 of the licence specifies the following conditions relating to waste water drainage infrastructure:

3.11.2 The licensee shall provide and maintain a waste water system at the facility which is capable of collecting all waste water generated at the facility.

3.11.3 The licensee shall install a shut-off valve at the waste water discharge point from the facility.

Noise:

Noise monitoring locations are currently specified at noise sensitive locations around the site as specified by *Schedule D.1, Table D.1.1* of the current licence. *Schedule C.1* specifies noise emission limits of 55dB(A) L_{Aeq} (30 minutes) during day-time hours and 45dB(A) L_{Aeq} (30 minutes) during night-time hours.

The 2008 AER confirms that a broadband survey and octave band analysis were carried out in July 2008 and this raised no concerns with regard to noise from the facility.

The facility is located in an industrial estate. The nearest residential dwellings are located approximately 194m north (on a local road), 160m north east (beside the N5 Road) and 292m south west of the facility. Noise monitoring locations specified by the current licence are located in the vicinity of these residential dwellings as shown in Appendix 1, Figure 1 below.

No complaints have been received to date regarding noise emissions from the facility.

Dust:

Dust monitoring locations D1 (near site entrance), D2 (along the northern boundary of the original site boundary) and D3 (northwest boundary of the original site boundary) are specified in *Schedule D.1* of the current licence. *Schedule D.2* specifies that dust deposition monitoring is carried out three times a year at these locations. *Schedule C.2* specifies a dust deposition limit of 350 mg/m²/day. Condition 7.1 requires the licensee to ensure that dust does not cause a nuisance at the facility or in the immediate area of the facility.

The 2008 AER confirms that dust monitoring carried out in January, August and October "...indicate that the dust deposition levels are below licence limits and are not a significant environmental impact of the facility".

No complaints have been received to date regarding dust emissions from the facility.

As it is proposed that wood shredding activities take place in the area which the site boundary was extended to cover by technical amendment and monitoring

locations D1, D2 and D3 above do not cover this area, I recommend that new dust monitoring locations be agreed with the Agency to cover this area. I recommend the following amendments:

- Existing Condition 5.1 *“All waste processing shall be carried out inside the waste transfer building.”*
 - Amend as follows: *“All waste processing shall be carried out inside the waste transfer building with the exception of wood shredding activities. The wood shredder shall not be operated when wind speeds exceed 10.7m/s (Force 5).”*
- Additional dust monitoring locations are to be agreed with the Agency in accordance with *Schedule D.1, Table D.1.1. Dust Locations*, which shall be amended to read *“Note 4: To be agreed with the Agency prior to commencement of outdoor wood shredding activities.”*
- Existing Condition 5.11 *“The north-eastern area outlined in blue on the Ordnance Survey Map Extract dated 20/11/2000 (scale 1:2500) submitted as part of the technical amendment application received on 13/04/06 shall be used only for the parking of empty vehicles and storage of empty skips, or as otherwise approved in writing by the Agency. No waste shall be processed or stored in this area”.*
 - Amend as follows: *“The north-eastern area outlined in blue on the Ordnance Survey Map Extract dated 20/11/2000 (scale 1:2500) submitted as part of the technical amendment application received on 13/04/06 shall be used only for the parking of empty vehicles, the temporary storage of empty skips, and the storage and shredding of waste wood except as may be otherwise agreed with the Agency.”*

2. Temporary storage of waste prior to sorting within the area of the facility extension:

The licensee has requested temporary outdoor storage of waste prior to sorting within the facility. This is generally not reflective of best practice, but can be allowed where conditions warrant it. If a general concession to outdoor storage is to be maintained the condition should be upgraded to ensure that the integrity of recycled or recyclable materials is assured.

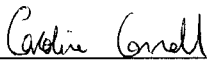
- Existing Condition 5.6.2 *“Unless otherwise agreed with the Agency all wastes other than segregated glass and baled paper, cardboard and plastic shall be stored indoors.”*
 - Add the following text to the condition: *“Recovered or marketable waste/materials produced at the facility, other than those listed above, may only be stored outdoors under conditions that will not diminish the integrity or value of the recovered waste/materials or lead to nuisance emissions including dust and odour.”*

Recommendation

For the reasons outlined above I recommend that the Agency agree to a technical amendment of the Bergin Waste Disposal Ltd., Ballaghaderreen Industrial Estate,

Ballaghaderreen, Co. Roscommon Waste Licence (Reg. No. W0163-01) under Section 42B(1)(a) of the Waste Management Acts 1996 and 2010.

Signed:



Caroline Connell

Inspector

Environmental Licensing Programme

Office of Climate, Licensing & Resource Use

APPENDIX 1

Figure 1:

