



Administration,
Environmental Licensing Programme,
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
Headquarters P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford

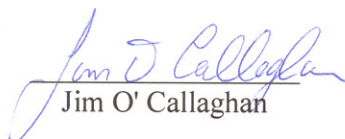
5th September 2011

RE: Waste Licence Review Application Reg. No. W0136-03 Greenstar Recycling (Munster) Ltd,
Sarsfieldcourt Industrial Estate, Glanmire, County Cork.

Dear Sir or Madam,

On behalf of Greenstar Recycling(Munster) Ltd Ltd, I enclose one original and one hard copy of the response to Agency's Notice issued under Article 14(2)(b)(ii) of the Waste Management Licensing Regulations for the above referenced facility. I also enclose two CD-ROM discs containing the response in searchable pdf format. The response includes a revised non-technical summary.

Yours sincerely,


Jim O' Callaghan

1004802/JOC/MS

Encs.

c.c. Mr. Malcolm Dowling, Greenstar Ltd.

NON TECHNICAL SUMMARY

This non-technical summary contains the information specified in Article 12 (1) (u) of the Waste Management (Licensing) Regulations, 2004 (S.I. No. 395 of 2004).

Articles 12 (1) (a) to (d)

Greenstar Recycling (Munster) Ltd. (Greenstar) Sarsfieldcourt Industrial Estate, Glanmrie, Co Cork is applying to the Environmental Protection Agency (Agency) for a review of Waste Licence W0136-02 at Sarsfieldcourt Industrial Estate, Sarsfieldcourt, Glanmire, Co Cork.

The purpose of the review is to extend the waste acceptance and operational hours to allow for 24 hour acceptance and operation; to allow the operation of a Civic Amenity Area where members of the public can drop off wastes; to increase the waste acceptance limits to 200,000 tonnes annually; to remove the existing requirement to achieve a 50% recovery rate and to revise the compliance locations for noise emission limits from the site boundary to the nearest noise sensitive location..

Compliance with Requirements of the Waste Management Act 1996 to 2003 as amended

Best Available Techniques (BAT) are and will be used to prevent, eliminate or, where this is not possible reduce to a minimum the impact of site activities on the environment.

Article 12 (1) (e) Nature of the Facility

The facility was granted a Waste Licence W0136-01 by the Agency in July 2001. This Licence was reviewed and replaced by Licence W0136-02 in May 2004.

The facility accepts and processes source separated and mixed non-hazardous solid wastes. The waste types include Household, Commercial & Industrial (C&I) and Construction & Demolition (C&D) waste. Day to day operations involve on-site mechanical and manual sorting, compacting, baling and transfer off-site to recycling/treatment facilities and residual landfill. The facility is authorised to compost biodegradable wastes, but the compost plant has not yet been built.

It is not proposed to change the waste operations or types of wastes, with the exception of small mounts of household hazardous waste at the Civic Amenity Area, to be accepted and the day to

day operations will remain generally the same. It is not proposed to construct any new buildings, alter the drainage system or install any new plant or equipment. The Civic Amenity Area will be in the north east of the site and will have a separate entrance from the main gate and will consist of a range of different containers, similar to the bring centres operated by the Council.

It is not intended to accept waste continually over 24 hours seven days a week and the majority of the wastes will continue to be accepted during normal business hours Monday to Saturday. However, due to the nature of the waste recycling business it is on occasion, necessary to accept waste outside the normal hours, for example to meet customer demands in relation to the collection of wastes in urban areas.

Article 12 (1) (f) Classes of Activity

It is not proposed to alter the classes of activity allowed under the existing licence. The relevant activities as per the Third and Fourth Schedules of the Waste Management Acts 1996 – 2011 as amended by the European Communities (Waste Directive Regulations) 2011.

TABLE B.7.1 THIRD AND FOURTH SCHEDULES OF THE WASTE MANAGEMENT ACTS 1996 TO 2010

Waste Management Acts 1996 to 2010					
Third Schedule Waste Disposal Operations		Y/N	Fourth Schedule Waste Recovery Operations		Y/N
D 1	Deposit into or on to land (e.g. including landfill, etc.).		R 1	<p>Use principally as a fuel or other means to generate energy: This includes incineration facilities dedicated to the processing of municipal solid waste only where their energy efficiency is equal to or above:</p> <ul style="list-style-type: none"> - 0.60 for installations in operation and permitted in accordance with applicable Community acts before 1 January 2009, - 0.65 for installations permitted after 31 December 2008, <p>using the following formula, applied in accordance with the reference document on Best Available Techniques for Waste Incineration: Energy efficiency = $(E_p - (E_f + E_i)) / (0.97 \times (E_w + E_f))$ where—</p> <p>‘E_p’ means annual energy produced as heat or electricity and is calculated with energy in the form of electricity being multiplied by 2.6 and heat produced for commercial use multiplied by 1.1(GJ/year),</p> <p>‘E_f’ means annual energy input to the system from fuels contributing to the production of steam (GJ/year),</p> <p>‘E_w’ means annual energy contained in the treated waste calculated using the net calorific value of the waste (GJ/year),</p> <p>‘E_i’ means annual energy imported excluding E_w and B_f(GJ/year),</p> <p>‘0.97’ is a factor accounting for energy losses due to bottom ash and radiation.</p>	
D 2	Land treatment (e.g. biodegradation of liquid or sludgy discards in soils, etc.).		R 2	Solvent reclamation/regeneration.	

D 3	Deep injection (e.g. injection of pumpable discards into wells, salt domes or naturally occurring repositories, etc.).		R 3	Recycling /reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes), which includes gasification and pyrolysis using the components as chemicals.	Y (P)
D 4	Surface impoundment (e.g. placement of liquid or sludgy discards into pits, ponds or lagoons, etc.).		R 4	Recycling/reclamation of metals and metal compounds.	Y
D 5	Specially engineered landfill (e.g. placement into lined discrete cells which are capped and isolated from one another and the environment, etc.).		R 5	Recycling/reclamation of other inorganic materials, which includes soil cleaning resulting in recovery of the soil and recycling of inorganic construction materials.	Y
D 6	Release into a water body except seas/oceans.		R 6	Regeneration of acids or bases.	
D 7	Release to seas/oceans including sea-bed insertion.		R 7	Recovery of components used for pollution abatement.	
D 8	Biological treatment not specified elsewhere in this Schedule which results in final compounds or mixtures which are discarded by means of any of the operations numbered D 1 to D 12.		R 8	Recovery of components from catalysts.	
D 9	Physico-chemical treatment not specified elsewhere in this Schedule which results in final compounds or mixtures which are discarded by means of any of the operations numbered D 1 to D 12 (e.g. evaporation, drying, calcinations, etc.).		R 9	Oil re-refining or other reuses of oil.	
D 10	Incineration on land.		R 10	Land treatment resulting in benefit to agriculture or ecological improvement.	
D 11	Incineration at sea (this operation is prohibited by EU legislation and international conventions).		R 11	Use of waste obtained from any of the operations numbered R 1 to R 10.	
D 12	Permanent storage (e.g. emplacement of containers in a mine, etc).		R 12	Exchange of waste for submission to any of the operations numbered R 1 to R 11 (if there is no other R code appropriate, this can include preliminary operations prior to recovery including pre-processing such as, amongst others, dismantling, sorting, crushing, compacting, pelletising, drying, shredding, conditioning, repackaging, separating, blending or mixing prior to submission to any of the operations numbered R1 to R11).	
D 13	Blending or mixing prior to submission to any of the operations numbered D 1 to D 12 (if there is no other D code appropriate, this can include preliminary operations prior to disposal including pre-processing such as, amongst others, sorting, crushing, compacting, pelletising, drying, shredding, conditioning or separating prior to submission to any of the operations numbered D1 to D12).	Y	R 13	Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).	Y
D 14	Repackaging prior to submission to any of the operations numbered D 1 to D 13.	Y			
D 15	Storage pending any of the operations numbered D 1 to D 14 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).	Y			

Article 12 (1) (g) Quantity and Nature of the Waste to be Recovered or Disposed

Table H.1 (c) Waste Types and Quantities

Waste Management Acts 1996 to 2010 3rd Schedule (Disposal) Operations			Waste Management Acts 1996 to 2010 4th Schedule (Recovery) Operations		
Class of Activity Applied For		Quantity (tpa)	Class of Activity Applied For		Quantity (tpa)
Class D 1			Class R 1		
Class D 2			Class R 2		
Class D 3			Class R 3		110000
Class D 4			Class R 4		10000
Class D 5			Class R 5		10000
Class D 6			Class R 6		
Class D 7			Class R 7		
Class D 8			Class R 8		
Class D 9			Class R 9		
Class D 10			Class R 10		
Class D 11			Class R 11		
Class D 12			Class R 12		
Class D 13		10000	Class R 13		5000
Class D 14		50000			
Class D 15		5000			

Article 12 (1) (h) Raw and Ancillary Materials, Substances, Preparations, Fuels & Energy used on the Site

Table 12(1)h: Estimate of Resources To Be Used On-Site

Resources	Quantities
Gas Oil	190,000 litres
Gear Oil	20 litres
Ad Blue	1,000 litres
Hydraulic, Transmission, Engine Oil	5,500 litres
Anti Freeze	100 litres
Electricity	500,000 units
Truck Wash Detergent	200 litres
Carbon	50,000 kg

Article 12 (1) (i) Plant, Methods, Processes, Abatement, Recovery, Treatment and Operating Procedures

The principal activity will remain the recovery of non hazardous wastes from households, commercial and industrial activities and construction and demolition sites. It is not proposed to alter the existing plant, methods, processes or abatement, recovery, treatment or operating procedures.

Greenstar has introduced an Environmental Management System (EMS) for the facility and the facility has been certified to ISO 14001. An external ISO 14001 audit was carried out in 2009 and found the facility to be fully compliant. The EMS includes environmental, management, operating and maintenance procedures.

Article 12 (1) (j) Information Related to Section 40(4) (a) to (g) of the Waste Management Act

Emissions from the facility, including noise, will not contravene any relevant standard or emission limit set in the current legislation, nor will they cause environmental pollution. The activity is consistent with the Cork Region Waste Management Plan and operations are based on guidance published by the Agency.

The Facility Manager and Deputy have completed appropriate training programmes for example the FAS Waste Management Training Programme.

Energy is used efficiently and measures will be taken to prevent accidents that could impact on the environment. If the facility has to close, the closure will be done in accordance with a Plan agreed with the Agency to ensure that pollution is avoided.

Article 12 (1) (k) Source, Location, Nature, Composition, Quantity, Level and Rate of Emissions

Actual and potential emissions from the facility to the environment include surface water, foul water, dust, odours and noise. The monitoring programme specified in the Licence includes foul and surface water, dust, odour and noise monitoring.

Surface Water/ Foul Water

It is not proposed to alter the existing surface water and foul water drainage layout. The proposal to increase the volume of wastes accepted, operate the civic amenity area and extend the opening hours of the facility will not impact on either emission. There will be no extra floor washdowns or increase to the areas where rainfall is collected. Monitoring of the emission has established that the facility is not impacting on surface water and that the foul water is suitable for treatment at an off-site waste water treatment facility.

Noise

Noise monitoring, which is carried out on site annually, has shown that facility operations have not impacted on the nearest noise sensitive locations (residences at Buck Leary's Cross Roads). An additional noise survey was carried out to assess the impact of the proposed operational changes of the facility at nighttime. The survey concluded that the proposed night

time operation was unlikely to have any impact at the nearest sensitive locations. The Civic Amenity will not be a significant source of noise.

Dust

Dust monitoring has been carried out three times annually since the facility began operations. The results show that the facility is not a significant source of dust. All waste handling and storage is carried out inside the MRF building. It is not proposed to alter the existing operations in terms of traffic movements, waste handling or processes etc. Additional traffic will use the facility but the current dust mitigation measures are working well and will continue to be employed.

Odour

The proposal to increase the waste volumes has the potential to generate odour impacts. An odour impact assessment has shown that the residual impacts (following mitigations measures) will be imperceptible.

Article 12 (1) (l) Details and Assessment of the Effects of Emissions on the Environment & Mitigation Measures

Surface Water

It is not proposed to alter the existing surface water drainage layout. The proposal to extend the operational and waste acceptance hours, operate the Civic Amenity and increase the volume of wastes accepted will not impact on the volume or quality of the discharge from the facility as all wastes will continue to be processed inside the building.

Foul Sewer

It is not proposed to alter the existing foul water drainage layout or increase the volume of foul water generated. The proposal to extend the operational and waste acceptance hours, operate the Civic Amenity and increase the volume of wastes accepted will not impact on the volume or quality of the discharge from the facility as all wastes will continue to be processed inside the building.

Dust

The current and proposed operations have not and will not have any measurable impact on dust levels in the vicinity of the facility. Dust monitoring has shown that the facility is not a significant source of dust. The proposed changes to the sites operation will not change this.

Noise

Noise monitoring carried out annually and in evening time has shown that noise levels are not impacting on the nearest noise sensitive location, residences at Buck Learys Cross Road.

Article 12 (1) (m) Monitoring and Sampling Points & Consequences of such emissions

Dust

Dust will continue to be monitored three times per annum at four locations on the property boundary.

Noise

Noise will continue to be monitored during day time hours annually on site and at the nearest noise sensitive location. In addition to this, it is proposed to carry out nighttime noise monitoring annually on site and at the nearest noise sensitive location.

Surface Water

The surface water discharge from the oil separator will continue to be monitored four times a year.

Waste Water

The wastewater collected on site prior to transfer to an offsite waste water treatment plant will continue to be monitored bi-annually in accordance with the existing licence requirements.

The effects of the emissions have been described in Article 12 (1) (l) above.

Article 12 (1) (n) Prevention and Recovery of Waste

Waste oils will be collected and sent off-site for recovery.

Article 12 (1) (o) Off-site Treatment or Disposal of Solid or Liquid Wastes

Wastewater from the site offices, canteen and toilets and run-off from the MRF floor yard discharges to the foul drainage system and collected in a tank, from where it is removed, as required, for treatment at an off-site waste water treatment facility. It is not proposed to alter this system.

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Article 12 (1) (p) Emergency Procedures to Prevent Unexpected Emissions

Greenstar have prepared an Emergency Response Procedure to deal with any emergency that may occur, including a fire and oil spills. The Procedure will ensure a rapid response to any incident by trained staff and minimise the impact on the environment.

Article 12 (1) (q) Closure, Restoration and Aftercare of the Site

The majority of the site is either paved or occupied by buildings. It is not anticipated that the waste processing will cease in the medium to long term. If the facility has to close, this will be done in accordance with a Decommissioning Plan agreed with the Agency. The plan may include for environmental monitoring to continue after the closure.

Article 12 (1) (s) Control of Major Accident Hazards involving Dangerous Substances Regulations

The facility is not subject to these Regulations.

Article 12 (1) (t) Emissions to Aquifer

The activity will not result in emissions of dangerous (List I and II) substances to an aquifer.

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