



OFF LICENSING & RESOURCE USE

ENVIRONMENTAL LICENSING PROGRAMME

To:	Dara Lynott, Director, Office of Environmental Enforcement	
From:	Michael Owens	- LICENSING UNIT
Date:	30 th November 2011	
RE:	Request for Technical Amendment to Waste Licence Register No. W0147-01 from Ashgrove Plant Ltd, Churchfield Industrial Estate, John F Connolly Road, Cork.	

Introduction

Ashgrove Plant Limited (t/a Ashgrove Recycling) was granted a waste licence (Register No. W0147-01) on the 28/03/02 to operate a waste transfer station and recycling facility in the Churchfield Industrial Estate in Cork. The activities licensed are Class 13 of the Third Schedule and Classes 2, 3, 4 and 13 of the Waste Management Act 1996. The site processes non-hazardous wastes only (primarily construction and demolition and commercial waste) to separate and prepare for recovery off-site. Materials for recovery at the facility include recyclables such as glass, metal, wood, soils, stone, gypsum and WEEE. Residual waste is sent to landfill for disposal. The quantity of waste that can be accepted at the facility is limited to 50,000 tonnes per annum. No liquid wastes are accepted at the facility.

Details of request for Technical Amendment

The licensee has requested Technical Amendment of the existing licence. The OEE has recommended that the changes proposed by the licensee cannot be accommodated under the existing licence. The reasons for the Technical Amendment are as follows:

1. Amendment of site boundary

The licensee has requested that the facility boundary be altered so that a parcel of land is removed from the remit of the licence. The particular parcel of land is at the south east corner of the Ashgrove Plant facility and borders a FAS Training Centre and a proposed new recycling centre for the Churchfield area (see figure 1 below).

As can be seen in figure 1, the existing licence boundary of the Ashgrove facility is outlined in red. The portion of land proposed for removal from remit of the licence is the blue-striped area at the south east corner of the site outlined in red and blue. The blue line will form the proposed new boundary between the Ashgrove facility and the proposed Churchfield Recycling Centre. The recycling centre is not yet operational but the operators of the recycling centre wish to obtain the parcel of land in order to provide a separate entrance to the recycling centre.

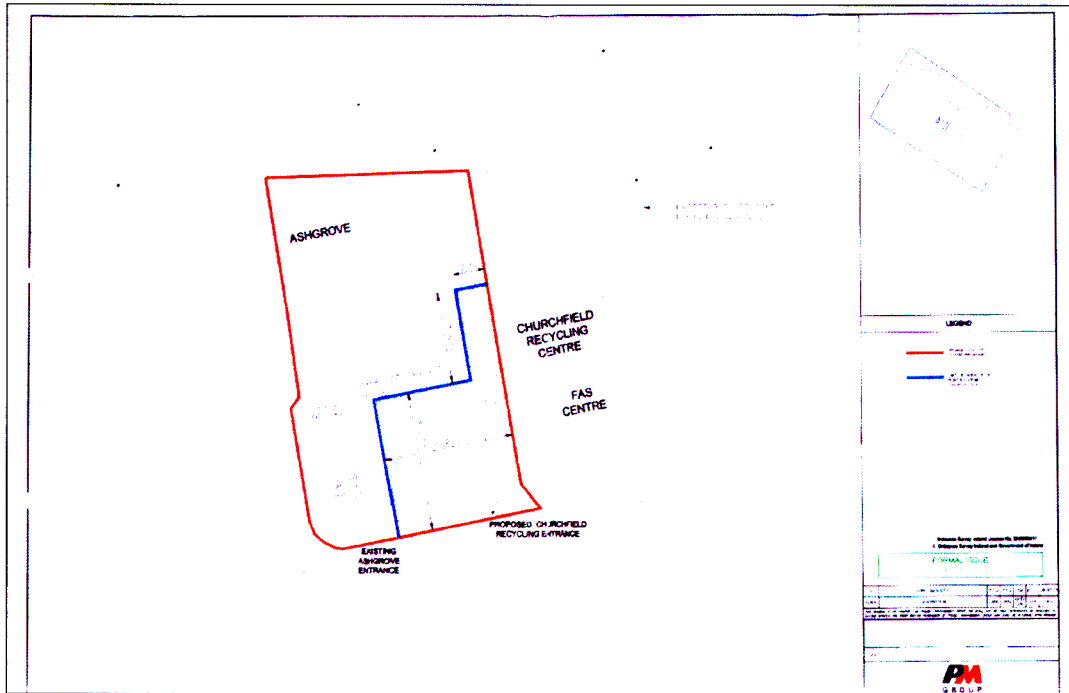


Figure 1 – Existing licence boundary

The parcel of land will remain in the ownership of Ashgrove Plant but is to be leased to a separate company who will operate the recycling centre (to be known as the Churchfield Recycling Centre) under a Waste Facility Permit from Cork County Council. The two facilities will operate as separate and independent waste management facilities. Figure 2 below sets out the proposed new boundary for the facility.

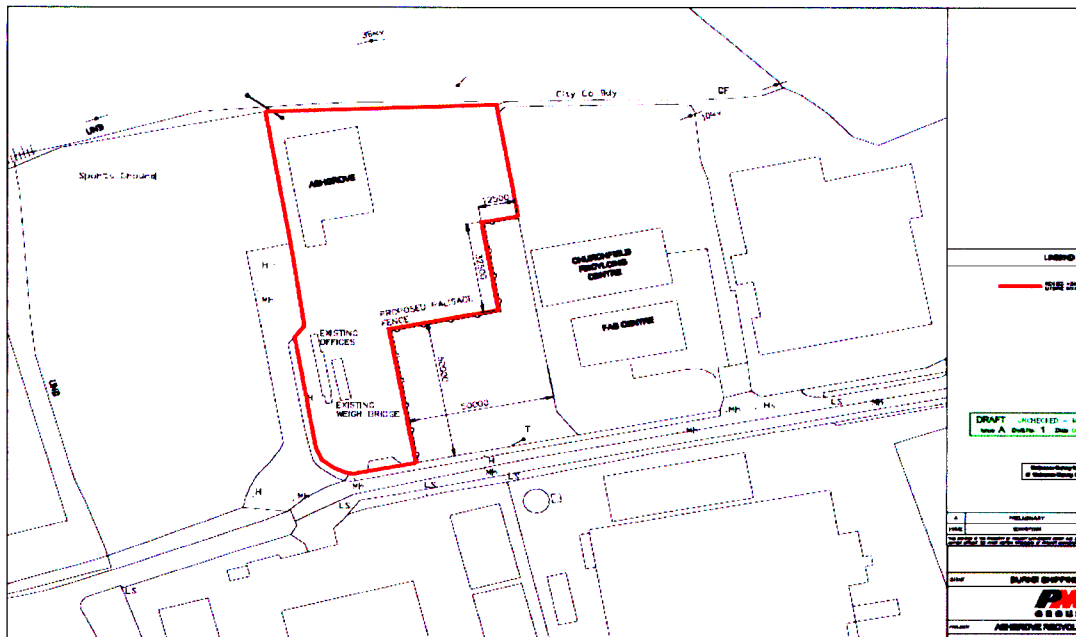


Figure 2 – Proposed licence boundary

The OEE has confirmed that:

1. The area proposed to be removed from the existing boundary will remain the property of Ashgrove Plant Ltd; and,
2. The land on which the Ashgrove Plant facility is located was purchased as a greenfield site prior to the development of the facility. The parcel of land proposed to be removed from the remit of the licence has never been used for waste storage and/or waste processing of any kind. There are no contamination issues in relation to the parcel of land.

Recommendation

Amend Condition 1.2 of the licence:

Existing Condition 1.2

For the purposes of this licence, the facility is the area of land outlined in red on Drawing No. APHL/01 entitled 'Site Location Map, Scale 1:2500' of the application. Any reference in this licence to "facility" shall mean the area thus outlined in red.

Recommended amended Condition 1.2

For the purposes of this licence, the facility is the area of land outlined in red on Drawing No. IE0310549-30-DR-0005 entitled 'Site Limits Drawing' provided with the request for Technical Amendment A. Any reference in this licence to "facility" shall mean the area thus outlined in red.

2. Foul effluent discharge

Foul effluent is produced by waste activities and the wash down of waste processing areas in the materials recovery building. Foul effluent passes through a Class 2 interceptor and water/oil separator prior to discharge to foul sewer.

Schedule C.4 of the licence sets out the emission limit values (ELVs) for the discharge to foul sewer. Monitoring results for the foul effluent discharge are, with the exception of sulphate, compliant with the ELVs specified in Schedule C.4. There are sporadic exceedences of the sulphate ELV in the foul effluent discharge. According to the AER for 2010, the sulphate ELV (at 100 mg/l) was exceeded on 3 occasions, ranging from 127 to 354 mg/l.

The source of the elevated sulphate emissions is the gypsum-containing waste being stored at the facility. The licensee has sought to reduce sulphate emissions to foul sewer by isolating the gypsum waste from other wastes. However, the licensee considers that the existing sulphate ELV cannot be met consistently and has requested that the ELV be increased from 100 mg/l to 300 mg/l (as SO₄).

The change in ELV will not lead to an increase in the volume of discharge of foul effluent to foul sewer. The foul sewer discharges to the city's main drainage network, and ultimately to the WWTP on Little Island. Cork City Council has agreed to the proposed increase in the sulphate ELV as requested by the licensee. Correspondence from Cork City Council confirming their consent was enclosed with the request for the Technical Amendment. The OEE has also provided their agreement to the proposed increase in the sulphate ELV.

The proposed change will not result in the relevant requirements of Section 40(4) of the Waste Management Acts 1996 to 2011 ceasing to be satisfied. Therefore, it is my view that this change can be accommodated by way of a Technical Amendment of the licence.

In addition to the above matter, it should be noted that when the licence issued in 2002, Schedule C.4 did not prescribe an 'Emission Point Reference Number' for the foul water discharge, leaving this to be agreed with the Agency at a later date. Following consultation with the OEE Inspector for the facility, it is clear that, although a reference number for the emission point has not yet been formally agreed with the OEE, the licensee has been utilising a particular reference number in its correspondence with the OEE. It is appropriate that the reference number as has been used by the licensee can now be inserted into the licence by way of this Technical Amendment

This particular issue was not raised by the licensee as part of the Technical Amendment request but the Technical Amendment presents an opportunity to insert a reference number.

Recommendation

Amend Schedule C.4 *Emission Limits for Foul Water Emissions to Foul Sewer* of the licence to (i) increase the sulphate ELV for the emission to foul sewer from 100 mg/l to 300 mg/l as requested, and (ii) to insert the an Emission Point Reference Number.

Existing Schedule C.4			
C.4 Emission Limits for Foul Water Emissions to Foul Water Sewer			
Emission Point Reference No.	To be agreed with the Agency prior to commencement of activities at this facility		
Volume to be emitted:	Maximum in any one day: 20m ³ Maximum rate per hour: 2 m ³ /hr		
Parameter	Emission Limit Value		
	Grab Sample (mg/l)	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD	1000	600	9
COD	2000	1200	18
Ammoniacal Nitrogen	20	12	0.2
Suspended solids	300	180	2.7
Sulphate (as SO₄)	100	60	1
pH	5-10	5-10	
Temperature	40	30	
Detergents (as MBAS)	100	100	2
Fats,oils and greases	100	50	1
Toxicity ^{note 1}	20 t.u.		
Note 1: Toxic unit (tu) = 100/48 hour EC ₅₀			

Recommended Schedule C.4

C.4 Emission Limits for Foul Water Emissions to Foul Water Sewer

Emission Point Reference No. **F01**

Volume to be emitted: Maximum in any one day: 20m³

Maximum rate per hour: 2 m³/hr

Parameter	Emission Limit Value		
	Grab Sample (mg/l)	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD	1000	600	9
COD	2000	1200	18
Ammoniacal Nitrogen	20	12	0.2
Suspended solids	300	180	2.7
Sulphate (as SO₄)	300	60	1
pH	5-10	5-10	
Temperature	40	30	
Detergents (as MBAS)	100	100	2
Fats,oils and greases	100	50	1
Toxicity ^{note 1}	20 t.u.		

Note 1: Toxic unit (tu) = 100/48 hour EC₅₀

Please note that the recommended amendments are highlighted in yellow above.

3. Surface water discharge

This matter was not included in the licensee's request for a Technical Amendment.

Surface water runoff is generated by rain water passing over the facility's hard-standing areas and roof tops. The runoff passes through a Class 2 interceptor prior to discharge to a storm water sewer. Schedule C.3 of the licence sets out the ELVs for the surface water discharge.

When the licence issued in 2002, Schedule C.3 did not prescribe a 'Monitoring Point' for the surface water discharge, leaving this to be agreed with the Agency at a later date. Following consultation with the OEE Inspector for the facility, it is clear that, although not yet formally agreed with the OEE, the licensee has been utilising a particular sampling point and reference number in its correspondence with the OEE. It is appropriate that the monitoring point and reference number as have been used by the licensee can now be inserted into the licence by way of this Technical Amendment.

This particular issue was not raised by the licensee as part of the Technical Amendment request but the Technical Amendment presents an opportunity to insert a reference number.

Recommendation

Amend Schedule C.3 *Surface Water Discharge Limits to Stormwater Sewer* of the licence to insert a Monitoring Point Reference Number for the discharge of surface water to the storm water sewer.

Existing Schedule C.3

C.3 *Surface Water Discharge Limits to Stormwater Sewer (Monitoring point to be agreed with the Agency).*

Parameter	Emission Limit Value
Mineral oils	100mg/l

Recommended Schedule C.3

C.3 *Surface Water Discharge Limits to Stormwater Sewer*

Monitoring Point Reference No. **S 01**

Parameter	Emission Limit Value
Mineral oils	100mg/l

Please note that the recommended amendment is highlighted in yellow above.

4. Gypsum waste

This matter was not included in the licensee's request for a Technical Amendment.

The source of the elevated sulphate emissions is the gypsum waste being stored at the facility. There is no specific provision in the licence in relation to the segregation and containment of gypsum waste to minimise sulphate emissions. The licensee has introduced some measure of segregation at the facility, however, the OEE inspector for the facility considers that further improvements can be made to the manner in which the gypsum waste is segregated (from other wastes) and managed at the facility and is therefore seeking the inclusion of specific controls in the amended licence.

Recommendation

Insert a new condition 5.3.9 into the licence setting out requirements in relation to segregation and containment of gypsum waste.

Recommended new Condition 5.3.9

Within two months of date of grant of Technical Amendment A the licensee shall

- (i) provide a covered area for separate storage of gypsum-containing waste;*
- (ii) agree with the Agency the measures necessary to prevent contamination of foul and surface water discharges with sulphate; and,*
- (iii) agree a time frame by which the measures set out in (ii) above shall be implemented.*

5. Facility security

This matter was not included in the licensee's request for a Technical Amendment.

(i) Fencing

It is proposed by the licensee that fencing will be installed along the new facility boundary to ensure adequate security and separation between the two facilities. It is considered appropriate to amend the existing condition in relation to fencing and security to reflect the change in site boundary.

Recommendation

Amend existing Condition 3.4.1

Existing Condition 3.4.1

Prior to the commencement of waste activities at this facility, security and stockproof fencing and gates shall be installed and maintained by the licensee as described in Attachment D.1(a) – Site Security.

Recommended amended Condition 3.4.1

Within two months of date of grant of Technical Amendment A, security measures, stockproof fencing and gates shall be installed and maintained by the licensee.

(ii) Facility entrance

It was confirmed by the licensee that the Ashgrove facility and the adjacent proposed new Recycling Centre will have two separate and independent entrances. Following consultation with the OEE Inspector for the facility it is proposed that, in the interests of ensuring separation between adjacent waste activities, a new condition be inserted into licence to prevent access between the facility and adjacent properties.

Recommendation

Insert a new Condition 3.4.3

There shall be no direct vehicular access between the facility and any adjacent property.

Overall recommendation

The Technical Amendment will not result in any change to the classes of waste activities carried out at the facility or in the types or amounts of waste accepted for recovery at the facility. It will not increase or otherwise affect the volume of foul effluent to be discharged from the site to the foul sewer.

For the reasons outlined above I recommend that the Agency agree to a Technical Amendment of the Ashgrove Plant Limited Waste Licence (Reg. No. W0147-01) under Section 42B(1)(c) of the Waste Management Acts 1996 to 2011

Signed



Michael Owens
Inspector
Office of Licensing, Climate and Resource Use