

Objection W01

Coolatore,
Ferns,
Enniscorthy,
Co. Wexford.

MURRAY

WASTE RECYCLING
LIMITED

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20 March 2012

Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford.

ENVIRONMENTAL PROTECTION
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Re: Proposed Waste Licence No: W0258-01

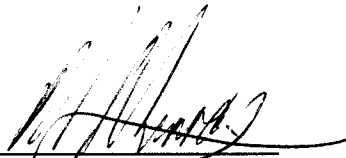
Dear Sirs,

I refer to the proposed decision on Waste Licence 258-01.

Please find attached an objection to the proposed decision along with our cheque for €500.00.

If you require any further information, please contact the undersigned.

Yours sincerely,


Michael Murray
Managing Director

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RECEIVED
Time 13:30 pm
20 MAR 2012
Signature TR
Environmental Protection Agency HQ.
P.O. Box 3000, Johnstown Castle Estate,
Co. Wexford.

MURRAY

WASTE RECYCLING

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ENVIRONMENTAL PROTECTION
AGENCY

2 U MAR 2012

RICHVIEW

**OBJECTION BY
MURRAY WASTE RECYCLING LTD.
TO THE PROPOSED DECISION ON
WASTE LICENCE W0258-01**

**MURRAY WASTE RECYCLING LTD.
COOLTORE
FERNS
CO. WEXFORD**

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ORIGINAL

MARCH 2012

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Waste & Environmental Management Services

OBJECTION BY MURRAY WASTE RECYCLING LTD. TO THE PROPOSED DECISION ON WASTE LICENCE W0258-01

Revision Status Of This Document

Rev. Nr.	Description of Changes:	Prepared by:	Checked by:	Approved by:	Date:
0	Issue to EPA	PL	MM	MM	27/02/12

Client: Murray Waste Recycling Ltd.

Abstract: In accordance with Section 42 of the Waste Management Acts, 1996 to 2011, Murray Waste recycling Ltd. this report forms an objection to the proposed decision of waste licence W0258-01 issued by the Environmental Protection Agency (EPA) on the 23rd February 2012.

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1. INTRODUCTION

Murray Waste Recycling Ltd. operates a material recycling facility at Coolatore, Ferns, Co. Wexford. In February 2009 an application was made to the Environmental Protection Agency (EPA) for a waste licence to accept 24,500 tonnes per annum (tpa) of mixed dry recyclables, segregated recyclables, segregated municipal bio-waste, municipal solid waste (MSW) and C&D waste.

In accordance with the Waste Management Acts 1996 to 2011, an applicant for a waste licence is allowed a period of 28 days in which to lodge an objection to a decision by the EPA.

A proposed decision on the waste licence application was issued by the EPA on 23rd February 2012. This document is the objection by MWR Ltd. to the proposed decision.

The summary of the objection to the proposed decision is shown in Table 1.

Table 1.1: Summary of Objection

Condition No.	Content	MWR Response
1.7.2	<i>Waste accepted at or dispatched from the facility only between the hours of 0800 and 2000</i>	Objection. Earlier start time requested.
1.7.3	Opening hours on Bank Holidays	Objection. Request a short opening period.
3.7.1	Installation of a wheel wash system	Objection. Alternative system proposed.
3.12.1 (ii)	Buildings used for storing or processing putrescible waste shall be maintained at negative air pressure	Objection. Alternative system proposed.
4.1.2 and Schedule B6	Use of composite sampler	Objection. Alternative system proposed.
6.1	Test Programme Report	Clarification.
Schedule C.6.1	Dust monitoring frequency	Objection. Alternative frequency proposed.

2. SUBSTANCE OF OBJECTION

2.1. Objections

MWR Ltd. make the following objections to the proposed decision. For ease of reading the Condition in the proposed decision waste licence is copied *in italics* followed by MWR objection or request for clarification.

Condition 1.

Condition 1.7 Waste Acceptance Hours and Hours of Operation

1.7.1 With the exception of emergencies or as may be agreed by the Agency, the waste facility shall be operated only between the hours of 0630 and 2100 Monday to Saturday inclusive. During night-time hours, all operations shall take place indoors.

1.7.2 With the exception of emergencies or as may be agreed by the Agency, waste shall be accepted at or dispatched from the facility only between the hours of 0800 and 2000 Monday to Saturday inclusive.

1.7.3 The facility shall not operate or accept/dispatch waste on Sundays or on Public Holidays unless agreed by the Agency.

In relation to Condition 1.7.2, MWR Ltd. respectfully requests that the hours be extended from 0800 to 0630. This is to facilitate waste vehicles exiting the facility that would have been loaded the previous day. Also, MWR Ltd. is located approximately 35 km from Wexford Town and 50 km from New Ross. Drive times are at least 40 minutes and 50 minutes respectively. An earlier commencement time would enable two runs to be undertaken during the day by waste collection vehicles. The collection vehicles would avoid peak traffic times in the locality. Where a driver would undertake two runs of bulked up waste in a day, an earlier start time would ensure that drivers would have adequate rest periods during the day, thus ensuring that transport is undertaken in a safe and responsible manner. This is essential to the safe and successful operation of MWR Ltd.

With regards to Condition 1.7.3, MWR Ltd. request that time be allowed on Bank Holidays to dispatch/receive waste collection vehicles only. MWR Ltd. requests a short time frame of 0800 to 1000 to facilitate waste collection from households on Bank Holidays.

Condition 3.

3.7 Weighbridge and Wheel Cleaners

3.7.1 The licensee shall provide and maintain a weighbridge and wheel cleaners at the facility.

3.7.2 The wheel cleaners shall be used by all vehicles leaving the facility as required to ensure that no trade effluent/storm water or waste is carried offsite. All water from the wheel cleaning area shall be directed to the trade effluent drainage network.

3.7.3 The wheel-wash shall be inspected on a daily basis and drained as required. Silt, stones and other accumulated material shall be removed as required from the wheel-wash and disposed of appropriately.

In relation to Condition 3.7.1 MWR Ltd. respectfully requests of the Agency that the requirement for wheel cleaners be removed. All vehicles travel on hardstanding areas, hence the potential for dirt on wheels is minimal. Vehicles exiting the recycling building are checked to determine if cleansing is necessary. If cleansing is required, the wheels of the vehicle are power-washed on site. Wash water from the power wash area will be directed to the trade effluent drainage network.

3.12 Dust/Odour Control

3.12.1 Within twelve months of the date of grant of this licence, the licensee shall install and provide adequate measures for the control of odours and dust emissions, including fugitive dust emissions, from the facility. Installation of an odour and dust management system shall at a minimum include the following:

(i) Dust curtains (or equivalent approved by the Agency) shall be maintained on the entry/exit points from the waste transfer building; all other doors in this building shall be kept closed where possible.

(ii) Unless otherwise agreed by the Agency, all buildings used for storing or processing putrescible waste shall be maintained at negative air pressure with ventilated gases being subject to treatment by a biofilter or a suitable alternative as specified by the Agency.

(iii) Provision of 100% duty capacity and 20% standby capacity, backups and spares must be provided for the air handling, ventilation and abatement plant.

In relation to Condition 3.12.1 (ii), MWR Ltd. respectfully seeks to remove this condition from the waste licence. The probability of odours emanating from the facility is minimal. Condition 6.19.1 stipulates that all putrescible waste, mixed municipal waste and waste or disposal is stored in a suitably covered and enclosed container(s). This waste is to be removed off site within 48 hours, thus the potential for odour generation is negligible. In addition, the facility has an indoor odour and dust suppression system installed, thus further reducing the potential for odours emanating off site.

MWR Ltd. also recognises the capital and running costs, and impact on energy usage associated with the installation of such a system.

In support of this request, since MWR Ltd. commenced operations at the site, no complaints with regards to odour have been received by MWR Ltd. or the local authority.

Condition 4. Interpretation

4.1.2 Composite Sampling

(i) No pH value shall deviate from the specified range.

(ii) For parameters other than pH and flow, eight out of ten consecutive composite results, based on flow proportional composite sampling, shall not exceed the emission limit value. No individual results similarly calculated shall exceed 1.2 times the emission limit value.

And SCHEDULE B: Emission Limits

B.6 Storm Water Emissions

The licensee shall install a composite sampler within three months of date of grant of this licence. All samples thereafter shall be collected on a 24 hour flow proportional composite sampling basis.

MWR Ltd. respectfully objects the requirement to install a composite sampler on site at SW3. MWR Ltd. understands that pH and temperature will be collected on a weekly basis. It is assumed that it will be necessary to determine temperature directly from the sampling location. The quarterly samples, as has previously been the case were collected as grab samples. MWR Ltd. requests the sample to be collected at SW3 be continued to be collected as a grab sample.

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Condition 6. Control and Monitoring

6.1 Test Programme

The licensee shall prepare to the satisfaction of the Agency, a test programme for abatement equipment installed to abate emissions to atmosphere. This programme shall be submitted to the Agency in advance of implementation.

6.1.2 The programme, following agreement by the Agency, shall be completed within three months of the commencement of operation of the abatement equipment.

MWR Ltd. seeks clarification on the content of the Test Programme report.

SCHEDULE C: Control & Monitoring

C.6 Ambient Monitoring

C.6.1 Dust Monitoring

Outlined below are results for dust deposition for 2007, 2008 and 2011.

Table 2.1: Typical Total Dust Deposition Monitoring Results

Sample No.	Inorganic Dust mg/m ² /day	Total Dust mg/m ² /day	Air Quality Standard* mg/m ² /day
D1 2007	160	320	350
D2 2007	13	73	350
D1 2007 (2)	57	77	350
D2 2007 (2)	44	51	350
D1 2008	198	339	350
D2 2008	35	130	350
D1 2009	29.8	23.8	53.6
D2 2009	32.1	79.8	112
D1 2011	15	16	350
D2 2011	50	97	350
D1 2011 (2)	23	186	350
D2 2011 (2)	20	55	350

The frequency of monitoring proposed in the licence is monthly. MWR Ltd. respectfully objects to this frequency and requests quarterly monitoring as an alternative, especially when there have been no issues with dust since the site commenced operations.