

**REPORT OF THE TECHNICAL COMMITTEE  
ON OBJECTIONS TO LICENCE CONDITIONS**

TO: Directors

FROM: Technical Committee ENVIRONMENTAL  
LICENSING PROGRAMME

DATE: 14<sup>th</sup> June 2012

RE: Objection to a Proposed Decision (PD) issued to Murray Waste Recycling Ltd., Coolatore, Ferns, County Wexford, Licence Register W0258-01

**Application Details**

Type of facility:	Non-Hazardous Materials Recovery Facility
Class(es) of Activity ( <b>P</b> = principal activity):	3 <sup>rd</sup> Schedule: D13, D14, D15. 4 <sup>th</sup> Schedule: R3, R4, R5 (P), R11, R12, R13.
Quantity of waste managed per annum:	24,500 tonnes
Classes of Waste:	Household, commercial, construction & demolition and industrial non-hazardous solid wastes.
Location of facility:	Coolatore, Ferns, County Wexford
Licence application received:	11 February 2009
PD issued:	23 February 2012

**1. Company and background to this report**

The application relates to an existing waste transfer station operated by Murray Waste Recycling Ltd (MWR) at Coolatore, Ferns, Co. Wexford. The facility operates under a waste facility permit from Wexford County Council. Waste acceptance at the facility commenced in September 2005. Murray Waste Recycling Ltd. applied for a waste licence to accept 24,500 tonnes of waste per annum.

This report relates to an objection received by the Agency in relation to the Proposed Decision issued to Murray Waste Recycling Ltd on the 23 February 2012 (Reg. No. W0258-01).

## 2. Consideration of the by Technical Committee

This report considers one valid First Party Objection. The main issues raised in the objection are summarised under various headings below. However, the original objection should be referred to at all times for greater detail and expansion of particular points.

Objector's name and Address	Date Received
Murray Waste Recycling Ltd	20 March 2012

The Technical Committee (TC), comprising of Michael Owens (Chair) and Ewa Babiarczyk, has considered all of the issues raised in the objection and this report details the Committee's comments Each objection is outlined in turn below.

### (i) Condition 1.7.2 – Hours for waste acceptance

Condition 1.7.2 of the PD states the following:

*'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.'*

It is requested by MWR, for operational reasons, that the hours of waste acceptance be set from 0630 to 2000.

### Technical Committee's Evaluation

There are five private dwellings within 75 metres of the facility and one premise within 25 metres of the facility. In order to prevent a noise impact at night time on these premises (i.e. between the hours of 2200 and 0800) Condition 1.7.1 of the PD requires that night-time operations be carried out indoors. The acceptance and dispatch of waste at 0630 would constitute outdoor operations during the night-time and could result in a night time noise impact in the locality.

Both the facility permit and planning permission stipulate that waste acceptance cannot commence until 0800 and there have been no complaints (or indeed submissions) in relation to noise nuisance due to operations at the facility to date. It is considered that if waste acceptance operations were to commence at 0630 there is an increased risk of a night time noise nuisance.

Notwithstanding this position, as can be seen above, Condition 1.7.2 allows some flexibility in that the waste acceptance time period can be amended with the agreement of the Agency. It may be possible to apply this flexibility on a trial basis to determine whether such operations have a noise impact. This can be explored and, if feasible, agreed with the OEE. Therefore it is not considered necessary to amend Condition 1.7.2 to change the period for waste acceptance at the facility.

### Recommendation:

No Change
-----------

### (ii) Condition 1.7.3 – Operations on Sundays and public holidays

Condition 1.7.3 of the PD states the following:

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

It is requested by MWR, so as to facilitate the collection of household waste on bank holidays, that the receipt and dispatch of waste vehicles be permitted for a limited morning

time period on bank holidays. It is not requested to carry out any other facility operations on bank holidays.

**Technical Committee’s Evaluation**

Condition 1.7.3 allows some flexibility in that operations on public holidays can be permitted with the agreement of the Agency. It may be possible to apply this flexibility on a trial basis. This can be explored and, if feasible, agreed with the OEE. Therefore it is not considered necessary to amend Condition 1.7.3.

**Recommendation:**

No Change

(iii) Condition 3.7 – Wheel cleaning

Condition 3.7.1 of the PD states:

*‘The licensee shall provide and maintain a weighbridge and wheel cleaners at the facility.’*

Condition 3.7.2 states:

*‘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 off-site. All water from the wheel cleaning area shall be directed to the trade effluent drainage network.’*

It is requested by MWR that in relation to Condition 3.7.1 the requirement for wheel cleaners be removed from the PD. It is contended by the applicant that as all vehicles travel on hard-standing areas at the facility there is very little potential for contamination of vehicle wheels. In addition, as stated by the applicant, all vehicles are inspected for contamination as they leave the facility and that vehicle wheels are cleaned by power-washing if required to remove contamination.

**Technical Committee’s Evaluation**

It is considered appropriate that the facility should retain some means of cleaning the wheels of waste vehicles prior to their exiting the facility, hence the requirement of Condition 3.7.1. However, the condition does not define ‘wheel cleaners’, it only states that wheel ‘cleaners’ be provided and maintained at the facility. The use of power hoses to clean vehicle wheels is considered by the technical committee to represent an adequate means of cleaning wheels, which would meet the requirement of Condition 3.7.1.

In addition, Condition 3.7.2 clearly stipulates that the wheel cleaners be used only *‘as required’* so as to ensure that contamination is not carried off site as a vehicle leaves the facility. It is considered that current practice at the facility adequately meets the requirement of Condition 3.7.2.

However, so as to ensure a more clear understanding of the scope of Condition 3.7.1, it is recommended to amend the Condition so as to require a ‘means of wheel cleaning’ rather than ‘wheel cleaners’.

**Recommendation:**

Amend Condition 3.7.1 to read as follows:  
*‘The licensee shall provide and maintain a weighbridge and a means of wheel cleaning at the facility.’*

(iv) Condition 3.12 – Dust/Odour Control

Condition 3.12(ii) of the PD states:

*'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.'*

It is requested by MWR that Condition 3.12(ii) be removed from the licence as it is contended by the applicant that, due to current practices on site and the additional controls imposed by other conditions in the licence, the potential for odours emanating from the facility is negligible. In support of this, the applicant points to the fact that no odour complaints have occurred in relation to the facility.

**Technical Committee's Evaluation**

It is considered by the technical committee that where putrescible waste is being stored there is potential for odour generation. Hence, it is appropriate that odorous gases be managed so as to prevent odour nuisance. It is accepted that current site practice does appear to have succeeded in preventing odour complaints. Condition 3.12(ii) allows some flexibility in its application. Therefore there is scope for an alternative odour management solution to be agreed with the Agency. Any alternative solution would of course require confirmation of its effectiveness in preventing odour nuisance. This can be explored and, if feasible, agreed with the OEE Inspector for the facility. Therefore it is not considered necessary to amend Condition 3.12(ii).

**Recommendation:**

No Change
-----------

(v) Composite Sampling

The PD requires the installation of a composite sampler and that within a specified time period all sampling shall be on a flow proportional basis at the frequency set in Schedule C.2.3 *Monitoring of Storm Water Emissions* of the PD. It is requested by MWR that the requirement to install a composite sampler be removed from the licence. It is contended by the applicant that current grab sampling arrangements are adequate to monitor the quality of storm water discharges.

**Technical Committee's Evaluation**

It is the view of the technical committee that where waste is being managed at a facility there is potential for contamination of storm water discharges. This potential for contamination is recognised in the PD whereby emission limit values for suspended solids and COD have been set for the storm water discharge at SW3. Given the nature of the activity at the facility and the fact the discharge finds its way to the River Bann (which is part of the River Slaney cSAC), it is necessary that a suitable monitoring regime be applied so as to develop a high level of awareness and control on the quality of the discharge. It is not considered that a simple grab sampling monitoring regime is appropriate in this regard. Therefore it is not recommended to amend the PD to remove the requirement for installation and use of a composite sampler.

**Recommendation:**

No Change
-----------

(vi) Test Programme

Condition 6.1 of the PD requires the preparation of a test programme for abatement equipment installed to abate emissions to atmosphere. Clarification on the content of the test report is being requested by MWR.

**Technical Committee's Evaluation**

The test programme will relate to abatement equipment installed to abate emissions to atmosphere, such as a biofilter. Any further detail on the programme should be sought from the OEE who will be best placed to provide clarification specific to the facility.

**Recommendation:**

No Change

(vii) Dust Monitoring

Schedule C.6.1 of the PD requires monthly monitoring of ambient dust levels at two locations in the vicinity of the facility. It is requested by MWR that, based on the results of ambient dust monitoring carried out sporadically in the period from 2007 to 2011, the frequency of monitoring be set at quarterly rather than monthly.

**Technical Committee's Evaluation**

The test results for dust deposition monitoring provided by the applicant with the objection indicate no significant impact on dust deposition levels in the vicinity of the facility. In light of that fact, and the fact that the activity at the facility is a comparably low scale waste activity, it is the view of the technical Committee that quarterly monitoring of dust deposition would be an appropriate testing frequency. It is recommended to change the frequency of dust deposition monitoring, as required by Schedule C.6.1, from monthly to quarterly.

**Recommendation:**

Amend Schedule C.6.1 as follows:

**C.6 Ambient Monitoring**

**C.6.1 Dust Monitoring**

**Location:** D1 (303889, 148561)  
D2 (304115, 148666)

Parameter	Monitoring Frequency	Analysis Method/Technique
Dust deposition	Quarterly	Bergerhoff

### 3. Overall Recommendation

It is recommended that the Board of the Agency grant a licence to the applicant

- (i) for the reasons outlined in the Proposed Decision, and
- (ii) subject to the conditions and reasons for same in the Proposed Decision.

Signed:

---

Michael Owens, Inspector  
for and on behalf of the Technical Committee