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Your reference: 09.PA0027

Re: Proposed mechanical biological treatment facility on the site of Drehid waste management facility in Coolcarrigan, Drummond and Kilkeaskin, Carbury, Co. Kildare

For the attention of Sinead McInerney, **by email.**

Dear Ms McInerney

I refer to your letter dated 13 September 2012 seeking the views of the Agency regarding a number of issues in relation to the proposed development of a mechanical biological treatment facility at the above location. The proposed facility in question is the subject of a waste licence application currently before the Agency, register number W0283-01. The Agency has made no decision as yet regarding the application and therefore a detailed examination of all the information which would be required to make a full assessment for the purposes of waste licensing has not been completed.

The Agency has examined the EIS for the development and it appears to identify, describe and assess the direct and indirect effects of the project on the factors identified in Article 3 of the EIA Directive (85/337/EEC as amended) including the interaction of those factors. The impact of the activity on the receiving environment has been addressed in the EIS. On the basis of the information contained in the EIS, and having regard to the mitigation measures as proposed, the Agency notes that the EIS indicates that the relevant parameters are met.

Overall, the EIS addresses the key points in relation to the environmental aspects of the proposed activity. The processing by the Agency of the licence application will evaluate these issues in greater detail and any licence as may be granted would fully implement the requirements of the relevant legislation. A licence may not be granted in respect of a waste activity unless the Agency is satisfied that it will not cause environmental pollution.

The applicant states there will be no discharges of process effluent to surface waters or groundwater. All wastewaters generated by the processes will be reused or removed by road from the facility for treatment elsewhere. Sanitary wastewater from staff welfare facilities will be removed by road from the facility for treatment at a waste water treatment plant. The proposal to install silt traps and oil/water separators (interceptors) on storm water discharges is a general minimum requirement in waste licences for storm water discharges. The applicant in this case proposes to install a number of surface water attenuation ponds/lagoons to provide for settlement of suspended solids and control of water discharge rates. Discharges

from these ponds during the operational phase of the development will be subject to regulation and control under a waste licence. The control of surface water discharges from paved areas and buildings is routinely the subject of licence conditions and the need in this instance for appropriate emission limit values and/or trigger levels at emission points will be assessed. The EIS proposes a monitoring programme for surface water (at discharge points and downstream) and groundwater and this will be assessed and amended as necessary in any licence proposed to be granted.

Odour prevention and control and regulation of air emissions generally, to minimise the discharge of odorous gases and potentially polluting compounds, is an important feature of licences. A number of measures are proposed to mitigate against odorous gas emissions from the facility, including:

- indoor waste processing areas kept under negative pressure with treatment of off-gases;
- rapid closing doors and air curtains;
- use of acid scrubbers and biofilters to deal with odorous off-gases;
- combined heat and power plant to combust biogas from anaerobic digestion with a standby gas flare;
- management plans and control systems for parameters relevant to odour and off-gas control.

Such controls (or similar) would be regarded as general requirements to be specified in a waste licence for activities of this nature. The environmental impact (ground level concentration) of air emissions from the biofilter and CHP processes are predicted in an air dispersion model that indicates that emissions to air will not cause exceedence of relevant standards at sensitive receptors. Subject to a detailed assessment of the application before the Agency, the emissions levels proposed by the applicant and their predicted ambient concentration/impact do not appear to contravene the requirements of appropriate legislation and guidance documentation. In the event that a licence is granted, all emissions to air including biofilters, CHP and flare, will be regulated and subject to limit values and operational controls such that environmental pollution is not caused.

Dust and noise mitigation and monitoring measures are typically required in waste licences and this facility is unlikely to be an exception in the event of a licence being granted.

Please note that the Agency will have no regulatory supervision and control of emissions and environmental impacts arising from construction activities at the site prior to waste acceptance commencing.

The following BAT-related documents, at least, will be relevant to the Agency in its assessment of the waste licence application:

- Final Draft BAT Guidance Note on Best Available Techniques for the Waste Sector: Waste Transfer and Materials, December 2011
- BATNEEC guidance note – Waste Sector (IPPC) 1996
- BREF on waste treatments industries 2006.

To my knowledge the Agency has not yet made any decision relating to a facility of the nature proposed involving the thermal drying of solid recovered fuel and the anaerobic digestion of municipal waste. A number of applications are before the Agency involving

similar activities. A number of composting facilities have been licensed by the Agency and copies of relevant licences are available to download at www.epa.ie.

The commentary in this letter is made without prejudice to any future decision of the Agency relating to the proposed development.

Yours sincerely,



Brian Meaney
Senior Inspector
Environmental Licensing Programme