

This document has been cleared for submission to the Director by Frank Clinton, Programme Manager.

Signed: *Gráinne O'Leary* Date: 13/2/13



OFFICE OF CLIMATE, LICENSING & RESOURCE USE

ENVIRONMENTAL LICENSING PROGRAMME MEMORANDUM

TO:	DARA LYNOTT, DIRECTOR
FROM:	Ewa Babiarczyk, Inspector
DATE:	13 th February 2013
RE:	Request for a Technical Amendment to Waste Licence Register Number W0177-03, held by Greenstar Environmental Services Limited in relation to a waste facility at Carrignard, Six Cross Roads Business Park, Waterford City.

Introduction

Greenstar Environmental Services Limited operates a non-hazardous waste transfer station at Carrignard, Six Cross Roads Business Park, Waterford City. The waste intake is limited to 80,000 tonnes per annum. The waste types accepted at the facility are commercial, industrial, household and construction & demolition waste. The facility was licensed on 14 November 2003 (Licence Register No. W0177-01). The licence was reviewed on 10 February 2006. A second revised licence (W0177-03) was issued on 24 August 2006. There has been no technical/clerical amendment of the existing licence since.

Details of Request for Technical Amendment

On 11 October 2011 the Agency received a request on behalf of Greenstar Environmental Services Limited to change *Schedule B.3 Emission to Sewer* of the existing licence. *Schedule B.3* specifies emission limit values (ELVs) and a flow rate at emission point (FW1) which discharges to a local authority sewer and reads as follows:

B.3 Emission to Sewer

Emission Point Reference No.: FW1
Location: As per Figure B.2.c (Revision 1a)
Volume to be emitted: Maximum in any one day: 2.5 m³

Parameter	Emission Limit Value	
Temperature	18°C (max.)	
pH	6 - 9	
	mg/l	kg/day
BOD	400	1.0
COD	1,100	2.7
Suspended Solids	300	1.0
Oils, Fat Grease	10	0.5
Conductivity	1500	--
MBAS	0.2	--

The request for technical amendment states that the wastewater generated at the facility arises from a truck and bin wash area and rainwater run-off from a section of paved open yard. It passes through two grit traps and an oil interceptor prior to discharge to Waterford City Council's foul sewer which connects to the Council's wastewater treatment plant (WWTP) at Bellview.

Greenstar Environmental Services Ltd. request an amendment of the ELV for detergents (MBAS) and the maximum flow rate at FW1. The request states that the existing ELV for detergents of 0.2 mg/l is so low that Greenstar Environmental Services Ltd. "cannot use any detergent to wash down vehicles or clean wheel bins". The request further states the ELV for detergent does not appear to take into consideration that wastewater from the facility discharges to a foul sewer and is treated later in a municipal WWTP. The request also points out that there is no reference to detergents in the Council's Section 52 Response which was submitted to the Agency on 12 May 2006, at the time of the processing of the licence review application for W0177-03. Accordingly, Greenstar Environmental Services Ltd. request that the ELV for detergent either be removed or increased to 100 mg/l. The request points out that the ELV of 100 mg/l is set in waste licences for other Greenstar facilities which discharge wastewater to municipal foul sewers and refers to licences for Greenstar Materials Recovery Limited (Licence Reg. No. W0188-01) and Greenstar Limited (Licence Reg. No. W0183-01).

The licensee further states that the restriction on wastewater flow of 2.5 m³/day is not achievable due to a requirement for daily washing of vehicles, cleaning a large number of wheeled bins and the fact that rainfall run-off is a component of the flow at FW1. Continuous flow monitoring carried out since April 2010 has shown that the maximum flow per day is 35 m³ and amendment to 50 m³/day is sought. The corresponding kg/day limits are also sought for change.

Waterford City Council was consulted in respect of the request for technical amendment and submitted a new Section 52 Response on 15 January 2013. The proposed technical amendment reflects the Council's recommendations.

OEE Consultation

In the memo dated 20 October 2011, the Office of Environmental Enforcement (OEE) advised that the proposed change cannot be accommodated under the existing licence.

Recommendation

For the reasons outlined above I recommend that the Agency agree to a technical amendment of the existing licence for Greenstar Environmental Services Limited for the facility at Carrignard, Six Cross Roads Business Park, Waterford City (Licence Reg. No. W0177-03) under Section 42B(1)(c) of the Waste Management Acts 1996 and 2012.

Signed:



Ewa Babiarczyk

Inspector

Environmental Licensing Programme

Office of Climate, Licensing & Resource Use