



ANNUAL ENVIRONMENTAL REPORT
GREENSTAR LIMITED
SIX CROSS ROADS, WATERFORD
LICENCE NO. W0116-02
JANUARY 2012 – DECEMBER 2012

Prepared For: -

Greenstar Ltd.,
Unit 6,
Ballyogan Business Park,
Ballyogan Road,
Sandyford,
Dublin 18.

Prepared By: -

O' Callaghan Moran & Associates,
Granary House,
Rutland Street,
Cork.

May 2013

Project		Annual Environmental Report 2012		
Client		Greenstar Ltd. W0116-02		
Report No	Date	Status	Prepared By	Reviewed By
0481305	21/05/2013	Draft	Jim O'Callaghan Msc.	Michael Watson MA
	31/05/2013	Final	Jim O'Callaghan Msc.	Michael Watson MA

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1. INTRODUCTION

This is the 2012 Annual Environmental Report (AER) for Greenstar Ltd. (Greenstar) Materials Recovery Facility (MRF) at Six Cross Roads, Butlerstown, County Waterford. The report covers the period from the 1st January 2012 to the 31st December 2012. Wastes were not accepted the facility for processing or transfer in 2012.

The content of the AER is based on Schedule F of the Waste Licence (W0116-02) and the report format follows guidelines set in the “*Guidance Note for Annual Environmental Report*” issued by the Environmental Protection Agency (Agency)¹. Cognisance was also taken of the AER Draft Guidance Document issued in January 2012².

¹ EPA (Environmental Protection Agency) 1999 Waste Licensing – Draft Guidance on Environmental Management Systems and Reporting to the Agency

² EPA (Environmental Protection Agency) 2012 Draft AER Guidance Document

2. SITE DESCRIPTION

2.1 Site Location and Layout

The facility is located at Six Cross Roads, Carriganard, Butlerstown and is accessible from the Six Cross Roads, just south of the Waterford by-pass (R710). The surrounding area to the north, south and east of the facility is occupied by industrial and commercial premises. The facility is bordered to the west by a third class road and agricultural land.

2.2 Waste Management Activities

The licence allows Greenstar to accept and process 70,000 tonnes of waste per annum, comprising commercial/industrial non-hazardous waste, household waste, and construction and demolition wastes. The facility was used for temporary storage of gypsum casting moulds until September 2011. In 2012, the facility was non-operational and, with Agency agreement, was used for the storage of empty skips and bins.

The Agency conducted a site inspection on the 18th September 2012 and a copy of the inspection report is in Appendix 1. The Agency requested Greenstar to tidy the yard and remove any remaining materials and wastes from the building. In response Greenstar removed two oil drums, one grease drum and two bins that had been stored in the yard and contained sodden debris. All of the remaining skips were inspected and any debris removed from the site. The yard and the interior of the building were swept. A copy of Greenstar's response to the inspection report is in Appendix 2.

3. EMISSION MONITORING

Greenstar carried out the specified surface water quality monitoring in Q1 2012 at the locations shown on Figure 3.1. Greenstar subsequently requested that, as no waste activities were taking place, that the monitoring programme be suspended. The Agency agreed that the monitoring could cease.

3.1 Surface Water Monitoring

Surface water monitoring was carried out in January 2012 at three locations (SW-1, SW-2 and SW-3). Rainwater run-off from the site discharges to a culverted stream on the eastern side of the access road (cul de sac). The receiving stream runs from the New Ring Road to the Six Cross Roads and is culverted from the start of the industrial estate to the Six Cross Roads.

The monitoring locations include the surface water discharge point and up and downstream of the discharge, as shown on Figure 3.1. SW-1 is to the north and upstream of the facility. SW-2 is at the discharge point and SW-3 is to the south and downstream, where the stream is not culverted. This is the closest accessible downstream location.

The samples were collected by Greenstar staff were analysed for the quarterly parameters specified in Schedule C of the Licence. The methodologies were all ISO/CEN approved or equivalent and the method detection limits were lower than the proposed trigger levels for the discharge. The results were all less than the proposed trigger levels.

Table 3.1 Surface Water Monitoring Results – January 2012

Parameter	Units	SW-1 Upstream	SW-2 Discharge	SW-3 Downstream	Proposed Trigger Level*
pH	pH units	7.72	7.19	6.98	5.5 – 9.0
Conductivity	mS/cm	0.207	0.211	0.413	1.000
COD	mg/l	94	11	88	40
Total Ammonia	mg/l	1.21	1.14	3.34	3.78
Suspended Solids	mg/l	111	24	189	-
Mineral Oils	mg/l	<0.01	<0.01	<0.01	-



Monitoring Locations		
SW-1	258297	109231
SW-2	258322	109102
SW-3	258352	108887
D1	258338	109073
D2	258319	109131
D3	258356	109126
N1	258321	109106
N2	258359	109126
N3	258339	109081
N4	258334	108877
N5	258422	108990



LEGEND

	Commercial/Industrial unit
	Private Dwelling
	Agricultural Land
	Surface Water Monitoring Point
	Dust Monitoring Point
	Noise Monitoring Point

FIGURE NUMBER

3.1

Scale	Not To Scale
Revision	A

CLIENT

Greenstar

TITLE

**Monitoring Locations
Waterford**



O'Callaghan Moran & Associates,
Granary House, Rutland Street,
Cork Ireland.
Tel: (021) 4321521 Fax: (021) 4321522
email: info@ocallaghmoran.com

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4. SITE DEVELOPMENT WORKS

4.1 Specified Engineering Works

No engineering works carried out in 2012.

4.2 Summary of Resource & Energy Consumption

The facility was not used for waste processing or administration purposes during 2012 and therefore no material resource or energy consumption.

4.3 Bund Integrity Test

Bund integrity tests were not carried out.

5. WASTE RECEIVED AND CONSIGNED FROM THE FACILITY

The facility stopped accepting waste in 2011 and no wastes were accepted in 2012. The total amount of waste accepted and consigned in the past five years is show on Table 5.1

Table 5.1 – Waste Received and Consigned since 2006

	2012	2011	2010	2009	2008
Total Received	0	714.00	14,151	22,366.17	28,595.73
Total Consigned	0	673.68*	13,869.05	22,650.92	28,714.10
Recovery Rate	NA	100%	100%	95.5%	96.8%

NA-Not Applicable

*6% water loss through evaporation.

6. ENVIRONMENTAL INCIDENTS AND COMPLAINTS

6.1 Incidents

There were no incidents at the facility in 2012.

6.2 Register of Complaints

No complaints were received in 2012.

7. ENVIRONMENTAL DEVELOPMENT

7.1 Environmental Management Programme Report

Not Applicable

7.2 Communications Programme

Not Applicable

7.3 Report Financial Provision

An Environmental Liability Risk Assessment, which includes details of the Financial Provisions, was submitted to the Agency in July 2012.

7.4 Nuisance Control

Pest control has been maintained on site throughout 2012. Rodent activity has been assessed as very light.

7.5 European Pollutant Release and Transfer Register

Not Applicable

7.6 Foul water Volume Transported Off-Site

No wastewater was removed from the facility in 2012.

8. OTHER REPORTS

No other reports were requested by the Agency during the reporting period.

APPENDIX 1

Agency Site Inspection Report



Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire

T: +353 53 916 0600

F: +353 53 916 0699

E: info@epa.ie

W: www.epa.ie

LoCall: 1890 33 55 99

Mr Malcolm Dowling
Greenstar Limited
Unit 6 Ballyogan Business Park
Ballyogan Road
Sandyford
Dublin 18

25/10/2012

Our Ref: W0116-02/gc07jmcc

Dear Mr Dowling

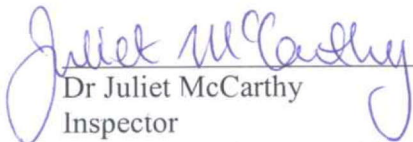
I write in reference to the site inspection of your facility (Waste Licence Reg. No. W0116-02) conducted by Agency personnel on 18/09/2012. Please find enclosed a copy of the site inspection report.

The Agency commends the staff of Greenstar Limited on having a compliant site inspection.

The Agency looks forward to a continued commitment by Greenstar Limited to comply with the requirements of the Waste Licence.

Please quote the above reference in future correspondence in relation to this matter. If you have any queries please contact a member of Licence Enforcement Team A at 053 9160600.

Yours sincerely


Dr Juliet McCarthy
Inspector
Office of Environmental Enforcement





Transfer Station Site Inspection Report

The site inspection process is a sample on a particular day of a facility's compliance with some of its licence conditions. Where a non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence. While observations may not constitute non-compliances with any condition of the licence, they should be addressed or where relevant noted by the licensee in order to ensure compliance, improve environmental performance of the facility and provide clarification on certain issues, as required. The licensee shall take the actions required to close out the observations raised in this Site Inspection Report. These actions will be verified during subsequent inspections. Please quote the Inspection Reference Number below in any future correspondence in relation to this Report.

Name of Transfer Station : Greenstar Limited, Six Cross Roads, Carriganard, Butlerstown, Co. Waterford.	Licensee : Greenstar Limited
Licence Register No. : W0116-02	Date of Inspection : 18/09/2012 Time in : 14:35 Time out : 14:55
Announced : No	Scheduled : Yes
Inspection Reference No. : W0116-02/sm03jmcc	Date of Issue of Inspection Report : 25/10/2012
Agency Personnel On Site:	Licence Personnel and Role:
1. Juliet McCarthy, Inspector, Office of Environmental Enforcement	1. Garrett Walsh, Environmental Officer
Photos Taken : Yes	Samples Taken : No
Report Prepared By : Juliet McCarthy	Video Taken : No
	Type of Visit : Site Inspection

* Y:Yes, N:No, NC:Not Checked, NA:Not Applicable

1. Odour	Y/N/C/ NC/NA*	Condition No.	Non Compliance*	Observation*	Comment/Corrective Action Required
1.1 Was odour from licensed activities identified?	NA				Licensed activities ceased.
1.2 Odour management infrastructure.	NA				Licensed activities ceased.

2. Waste Records	Y/N/C/ NC/NA*	Condition No.	Non Compliance*	Observation*	Comment/Corrective Action Required
2.1 Are waste records being maintained in accordance with the licence?	NA				Licensed activities ceased therefore no waste records maintained. All other records for this site are available at the W0177-03 site.

3. Waste Storage and Processing Areas	Y/N/C/ NC/NA*	Condition No.	Non Compliance*	Observation*	Comment/Corrective Action Required
3.1 Issues in relation to waste storage areas.	Y			Y	Numerous empty wheelie bins, two empty oil tanks and a customer baler are stored in the yard area. Several of the bins contained small amounts of dirty water and litter. The yard was dirty. In the transfer building there were two drums of oil stored on a mobile bund, one metal drum of grease in the bund room, one wheelie bin contained a small amount of oil, the floor was dirty, and it was not possible to determine if the heating oil tank was empty.
3.2 Issues in relation to waste processing areas.	N				Corrective Action Required: The licensee is required to tidy up the yard and inside the transfer building and remove any remaining materials and wastes from the site. The licensee should also clarify if the heating oil tank has been emptied. Licensed activities ceased.

* Y:Yes, N:No, NC:Not Checked, NA:Not Applicable

4. Residual MSW Processing		Y/N/C/ NC/NA*	Condition No.	Non Compliance*	Observation*	Comment/Corrective Action Required
4.1 Is MSW accepted at the facility?		NA				Licensed activities ceased.
4.2 Is MSW currently being treated at the facility?		NA				Licensed activities ceased.
4.3 Destination of MSW residues.		NA				Licensed activities ceased.
5. Other Issues		Y,N,C, NC,N/A*	Condition No.	Non Compliance*	Observation*	Comment/Corrective Actions
Environmental Liabilities Risk Assessment.		Y	12.3.2		Y	The licensee submitted an ELRA for the site in July 2012. The Environmental Officer said that this was completed as if the site was still operational.
Environmental Monitoring		Y	6.1		Y	The licensee ceased environmental monitoring at the site after Q1 2012, with the Agency's agreement (doc. ref. Clos1jmcc, issued 11/05/12).
Decommissioning & Independent Closure Audit		N	10.1 & 10.4		Y	The licensee should arrange for an Independent Closure Audit to be carried out at the site as per Agency correspondence issued on 11/05/12 (doc. ref. Clos1jmcc). The scope of this audit should be agreed with the Agency prior to the audit. The licensee is required to clarify if the site was decommissioned in accordance with Condition 10.1 and the agreed Decommissioning Plan, and submit the validation report in accordance with Condition 10.4.
Annual Environmental Report 2011		Y	11.8		Y	The Agency notes the following from the 2011 AER: (1) The last bund integrity test was carried out in April 2008.

* Y:Yes, N:No, NC:Not Checked, NA:Not Applicable

						<p>(2) Page 11 outlines that no oils/diesels were stored at the facility in 2011 - the licensee is referred to Section 3.1 above and instructed to remove any remaining oils/materials from the facility.</p> <p>(3) Page 16 outlines that there is insurance cover for unknown environmental liabilities, but no details of the financial provision for known liabilities are given. As part of the AER, the licensee is required to provide an annual statement of measures report in accordance with Condition 12.3..</p>
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FOLLOW-UP ACTIONS

The licensee shall take the actions required to close out the observations raised in this Site Inspection Report. These actions will be verified during subsequent inspections.

Please quote the above Inspection Reference Number in any future correspondence in relation to this Report.

Date : 25/10/2012

Signed : 
Dr Juliette McCarthy

APPENDIX 2

Greenstar Response to Agency Inspection Report



Dr Juliet McCarthy
Inspector, O.E.E
Environmental Protection Agency
Headquarters, P.O. Box 3000
Johnstown Castle Estate
County Wexford

Greenstar Limited
Unit 6, Ballyogan Business Park,
Ballyogan Road, Sandyford
Dublin 18.
Tel: + 353 1 294 7900
Fax: + 353 1 294 7990
E-mail: info@greenstar.ie

09th November 2012

Your Ref: W0116-02\gc07jmcc

Re: Inspection at Greenstar Ltd, Six Cross Roads , Butlerstown, Waterford City
(Licence Ref. No. W0116-02)

Dear Dr McCarthy,

I refer to your letter of 25th October 2012 with enclosed Site Inspection report (Inspection Reference No. W0116-02-02/sm03jmcc) detailing findings of the inspection carried out at the above facility on 18th September 2012.

As the Agency is aware this facility is currently not operational and there are no immediate plans to recommence waste management activity at the site. Should this situation change, the Agency will of course be notified at the earliest possible opportunity.

We note that the facility was found to be compliant on this occasion and welcome the commendation provided by the Agency in recognition of the efforts made to maintain the compliant status. We remain fully committed on that point and on fulfilling licence requirements.

The following section includes corrective actions in relation to the observations raised.

Inspection Observations

1. Storage and Processing areas (Item 3)

As observed during the inspection, the site is mainly used for the storage of empty wheelie bins. The two bunded oil drums observed in the workshop were removed to GES Waterford on 19th September 2012 and the single metal grease drum was removed observed in the bund room was removed during the following week.

A minor amount of sodden debris was observed stuck to the bottom of two 1,100 litre bins in the yard. These bins were removed and all remaining wheelie bins in storage were inspected, rearranged and any debris removed on 25th September 2012. The exterior yard area was thoroughly swept and a cleaning of the shed interior will be completed by the end of week commencing 12th November 2012. Clarification in relation to the heating oil tank shall also follow during that week.

2. Decommissioning and Independent Closure Audit (Item 5, Other Issues)

On 28th June 2012 a Greenstar delegation including Malcolm Dowling and Garrett Walsh met with Senior Agency enforcement personnel, Damien Masterson and Breege Rooney to discuss compliance issues at a number of Greenstar facilities that are subject to enforcement from the Southeast OEE Office. One of the facilities discussed was the former WUS facility.

During this part of the discussion, it was explained that Greenstar had no intention of voluntarily seeking licence surrender for the facility and that we would continue to consider potential uses for the site as they arose. It could be that such future uses would require prior Agreement through the submission of an SEW for example. In any case, the Agency will be kept fully informed and would be contacted at an early stage. Essentially, this status remains unchanged and site use is confined for the time being to the storage of empty wheelie bins and some equipment that is not in use.

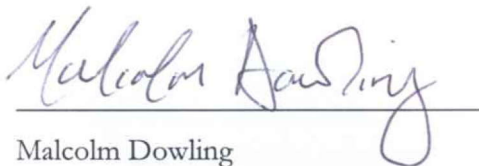
In Receivership

With regard to licence surrender, whilst our intention is to retain the waste licence, it was made clear to Greenstar at the meeting that the licence would effectively be considered "surrendered" in or about October 2014, i.e., 3 years after the removal of gypsum that was temporarily stored at the site up to September 2011. This of course is dependant on no submission for licence extension being received and granted.

Greenstar was informed in no uncertain terms at the meeting in June 2012 that given the nature of the facility, environment monitoring results to date and our plans to recommence activity at some future stage within the 3 year timeframe (and this could occur will relatively short notice), there was no short-term requirement to arrange for a full independent closure audit. This is contrary to what is indicted in the Inspection Report. I would therefore be obliged if the Agency would confirm the requirement for an Independent Closure Audit at this point and specify the extent of audit required in this instance (taking into account the structure of the facility, nature of the site activity and environmental record to date). If the Agency decides that such a requirement exists prior to the completion of the 3 year licence surrender period (October 2014), then I would be obliged if on this occasion, a deferral could be considered at this particular time so that situation could be revisited in 2013.

I trust that the information contained in this response addresses the required corrective actions and I look forward to hearing from you in relation to certain additional clarifications. If necessary, I am to meet with you to discuss further. In the meantime Greenstar will continue efforts to ensure that the facility remains compliant with our licence.

Yours sincerely,



Malcolm Dowling

Group Environmental Compliance Manager