

Comhairle Chontae Uíbh Fhailí

Tel: 057 9346800 • Fax: 057 9346868

Website: www.offaly.ie

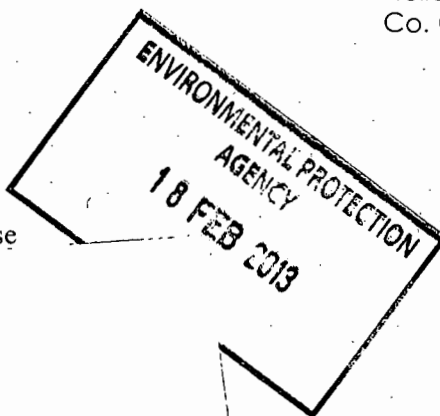
email: secretar@offalycoco.ie

Offaly County Council

Áras an Chontae,
Charleville Road,
Tullamore,
Co. Offaly.



Mr. Brian Meaney
Environmental Licensing Programme
Offaly of Climate, Licensing & Resource Use
EPA Headquarters
PO Box 3000
Johnstown Castle Estate,
Co. Wexford



15th February 2013

Dear Mr. Meaney,

Offaly County Council wish to request a Technical Amendment be considered for Waste Licence WEL29-04, Derryclure Landfill.

Details of the proposal are attached as Appendix 1, including references to the License Conditions, maps and illustrations of the proposal.

This proposal has already been assessed by the OEE Kilkenny Inspectorate, who advised that the proposal cannot be accommodated under the Conditions of WL 29-04; the OEE response is an extract from the EDEN system and is included as Appendix 2.

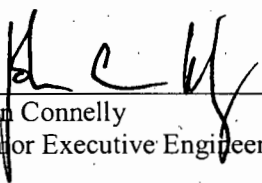
I wish to request that a review of the proposal on the basis that the activity is not a material change in the activity on the site; can be accommodated in the Classes licensed; does not incorporate any permanent infrastructure and does not give rise to any additional environmental risks or emissions arising from this activity.

Currently facilities are provided at Derryclure Waste & Recycling Facility for the acceptance of general waste, recyclables, green waste, C&D, WEEE etc. However throughput is relatively low and the ongoing viability of operating the site in this way is uncertain. Moreover, the necessary continuing management and monitoring of the site is a drain on the Councils already stretched financial resource.

We believe the proposal offers an opportunity to improve the viability of the site, operating a service to the public without incurring environmental risk, and within the scope of the existing licence.

The Council request that the details are considered as a Technical Amendment by the Environmental Licensing Programme. Please return if you require further details to support your assessment.

Is mise, le meas,


John Connelly
Senior Executive Engineer



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Appendix 1

1. Description of Proposal

Offaly Co. Co. propose the use of a mobile conveyor transfer plant within the Derryclure facility. This would allow the deposition of waste within a fully enclosed conveyor belt, which would transport the waste up to two hoppers where the waste is dropped down to a waiting trailer at either side of the belt. No waste makes contact with the ground, as all material is emptied from the covered belt to the waiting trailers, on either side of the plant. Appendix 1 illustrates the equipment proposed and also its proposed location on site.

This area is known as the Tipping Area as it has functioned as a Transfer Area when the site was fully operational, and has continued to function as a Transfer Area since landfilling activities ceased on the site in October 2011. Originally waste was deposited by all vehicles other than lorries at this location, and transferred in trailer units to the landfill face by Council staff. Since October 2011, a private company have been contracted to manage this area on behalf of the Council. Waste is deposited as normal, with all material being bulked up and removed to authorised sites for processing. There is no processing on site; waste is placed in trailers or compactor units, and moved off site for processing.

2. Reasons for the Proposal

The proposal for the use of the mobile conveyor transfer plant is being considered to allow the current practices to continue and extend as the waste infrastructure in the midlands area has changed significantly in recent times and facilities are required to address the demand, as the public and commercial operations seek alternative ways to manage their waste. Also the proposal would include the acceptance of waste from a number of refuse lorries, providing efficiencies in relation to fuel, vehicle movements and more efficient service of the local area. From the County Councils perspective, the proposal would provide an income stream which would help defray the cost of ensuring ongoing licence compliance at Derryclure.

3. Increases/Changes in Emissions & Likely Impacts

The following are the impacts of the proposal:

Vehicle movements: This system would be used for existing larger vehicles currently using the transfer facility operating at Derryclure Landfill. The additional traffic would relate to refuse vehicles depositing waste, which are not part of the current traffic flow. Initial estimates are for a small number of these vehicles (5-6 vehicles) using the site up to twice per day i.e. 10 tips per day with 5 loads transferred off-site to a waste licensed site – totaling an additional 15 vehicle movements per day. A traffic management system will be established to addresses these movements.

The volume of traffic proposed is significantly lower than traffic levels at the site in 2011, when 40 trucks, 10 skip lorries and a significant volume of public traffic was using the site daily.

Waste Volumes: The current activity level at Derryclure Landfill Transfer Area is approx 2,000 tonnes/annum. The proposed system would bring this to approximately 10,000 tonnes MSW and 2,500 tonnes domestic Dry Recyclables. There will be no changes to operating hours on the site.

Condition 1.7 and Schedule A: Waste Acceptance defines the tonnages for acceptance under WL29-04 and the volumes proposed are within the criteria defined.

Emissions: There are no negative emissions arising from the proposal. The activity will comply with *Conditions 5.2, 5.3 and 5.4*. There will be no increases in noise, dust, odour, litter or the list included under *Condition 5.3*.

There will be no impact to waters or other environmental media as the waste will not be placed on the ground of the site at any point, and measures will be implemented to address any spills on the hardcore area, should they arise.

While there will be no unloading of waste at the site, the area proposed is protected against spillage and run-off as required under *Condition 8.5*, as it drains to a holding tank that is emptied at intervals and the liquid transferred to the WWTP.

The waste for transfer will not be stored on site, and will be removed off-site on a daily basis. In the event of temporary storage, it will be stored in designated areas in compliance with *Condition 8.6*.

The activity shall be included under the site Litter Control measures, addressing the requirements of *Condition 6.4 (6.4.1 – 6.4.4)*.

Waste Acceptance: Waste shall only be accepted at the facility in accordance with *Condition 8.2.1*, and in the case of the Recycling Centre, *Condition 8.17.1*.

Waste sent off-site for recovery or disposal shall be transported in accordance with *Condition 8.3*.

In the event of any changes on the site, waste acceptance procedures shall be revised to ensure continued compliance with *Condition 8.2.2*.

All waste entering the site is recorded on the weighbridge system, as required under *Condition 11.8* and will allow records as required under *Condition 11.9* to be available to the Agency as required.

The activity in principle is the same as has existed since the Council ceased landfilling, with all waste transferred off-site to waste licensed sites. This proposal would not change the current services provided.

Condition 3.26 references the Civic Amenity Site – which is the Recycling Centre operating at the site- to the south of the weighbridge. *Condition 3.27* relates to a Composting Facility which was included in the Waste Licence application, and EPA determination of same, and shows that the site was assessed for activities other than landfilling and CAS when the original application was considered.

Condition 8.1 states the “*Disposal or recovery of waste on-site shall only take place in accordance with the conditions of this license and in accordance with the appropriate National and European legislation and protocols*”. The Council feel that the activity proposed can be accommodated under the licence.

4. Supporting Information

Classification of Activity:

The *Decision of the Agency for WL 29-04* (dated 14th October 2010) which forms the front of the Waste License includes the following classes:

- *Waste Disposal Activities in accordance with the Third Schedule of the Waste Management Acts 1996 – 2010: Class 1; 4; 5; 7; 11 & 13.*
- *Waste Recovery Activities in accordance with the Fourth Schedule of the Waste Management Acts 1996 – 2010: Class 2; 3; 4; 9 & 13.*

A review of existing Waste Licences which accept and bulk-up/transfer waste for processing off-site include similar classes within their authorisations, for example the following licences WL 223-01; WL 44-02; WL 152-03; WL 238-01, WL 242-1 and WL 261-01.

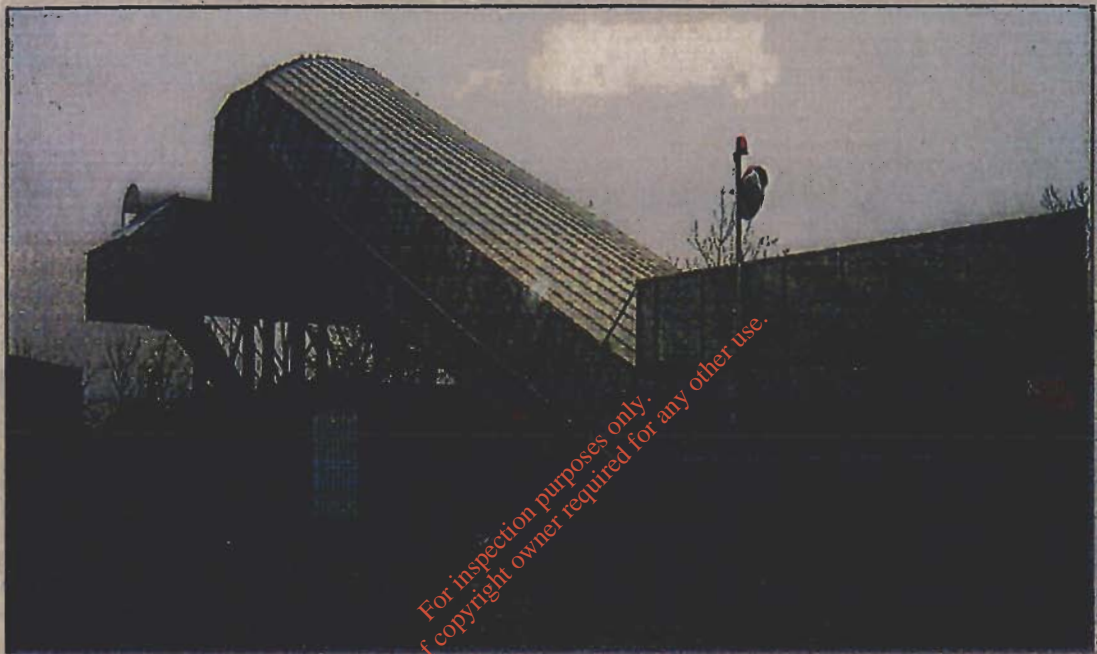
The Council consider the activity proposed is covered under the existing classes of WL 29-04.

Maps & Drawings

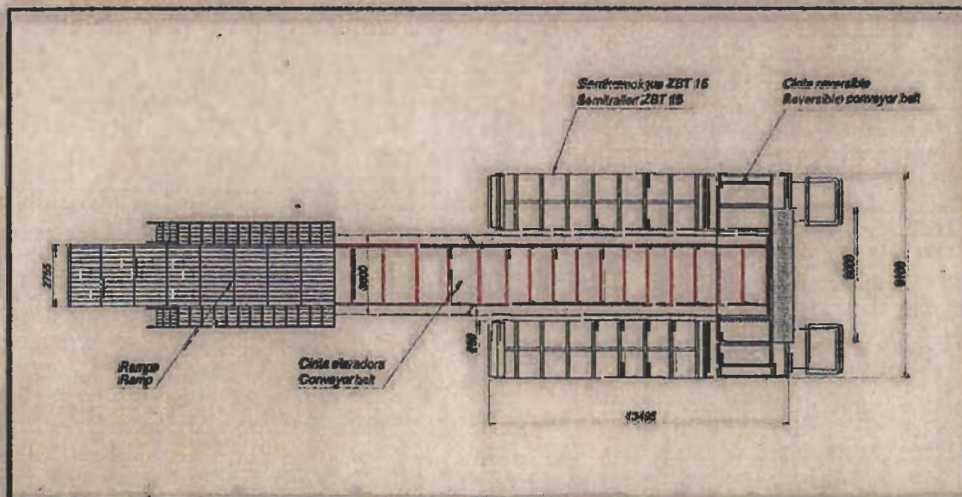
- Map illustrating location of proposed plant on site
- Examples of the mobile plant being considered in the proposal

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PLANTA DE TRANSFERENCIA REVERSIBLE REVERSIBLE TRANSFER PLANT



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La planta reversible tiene una cinta reversible que permite cargar dos semiremolques auto-compactantes ZC Bt15 de 72 m² de forma simultánea.

The reversible plant has a reversible conveyor belt that allows to charge simultaneously two ZC Bt15 self-compacting semi-trailers of 72 m²



Appendix 2

Response from OEE Kilkenny Inspectorate

For inspection purposes only.
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Dear Mr Connelly,

The Agency has reviewed your submission LR000302, "Request for direction regarding the proposal to locate mobile conveyor transfer plant within Derryclure facility", received by the Agency on 16th January 2013.

The advice is sought as to whether the proposal can be addressed under Condition 1.4 or 3.5 of Waste Licence Reg. No.W0029-04 or direction on same.

This proposal cannot be accommodated under the Conditions of your licence.

A Technical Amendment Section 96(1) of the EPA Acts or a Review of your licence Section 90(1) of the EPA Act will be required to accommodate the proposal.

To determine if the proposal can be accommodated by Technical Amendment you should submit the following information to the Agency's Environmental Licensing Programme (ELP), EPA, P.O. Box 3000, Johnstown Castle Estate, Co. Wexford:

- Details of the requested change(s)
- Reasons for the change(s) requested
- Details of any increase or changes in emissions resulting from the change(s)
- An assessment of the likely impacts of any increase/changes in emissions

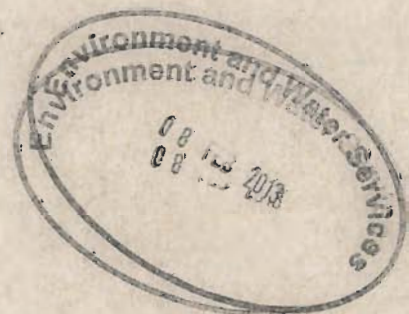
If the alteration is considered to be a significant change and cannot be accommodated by a Technical Amendment, the ELP will notify you of the process for applying for a Review.

Please quote the above reference in any future correspondence in relation to this matter.

The team dealing with this matter is OEE Kilkenny Team A.

Yours sincerely,

Dermot Burke
Office of Environmental Enforcement, Kilkenny,
Tel: 056-7796700



Licensing Notice Details

Home >> All Licences >> Derryclare Landfill (W0029-04) >> All Actions & Notices >> LS Rejection - Notice - Free Text - EDEN

Subject

LS Rejection - Notice - Free Text - EDEN

Created Date

07/02/2013

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Licence Details

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