

From: Macolm Dowling [mailto:malcolm.dowling@greenstar.ie]
Sent: 12 November 2013 12:01
To: Licensing Staff
Subject: New Applicant objection entered for Reg no: W0136-03. (Reference Number: W0136-03-131112120010)
Importance: High

Objection submitted on: 12/11/2013 12:00
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Oral Hearing: No

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Objection To
Proposed Decision
Waste Licence Register No: W0136-03

Prepared For: -

Greenstar Recycling (Munster) Ltd
Sarsfieldcourt Industrial Estate,
Sarsfieldcourt,
Glanmire,
County Cork.

Prepared By: -

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

12th November 2013

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1. INTRODUCTION

The applicant, Greenstar Recycling (Munster) Ltd (Greenstar), wishes to object under Section 42 of the Waste Management Acts, 1996 to 2013, to a number of the Conditions and Schedules in the Proposed Decision (PD) for Waste Licence Register Number W0136-03 for its Materials Recovery Facility at Sarsfieldcourt, Glanmire, County Cork.

Section 2 contains the grounds for the objections. The actual Conditions are presented in italics followed by Greenstar's grounds for objection. The appropriate fee for the objection (€500) was paid electronically.

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2. GROUNDS FOR OBJECTION

Condition 3.5.2- Maintenance of Impermeable Concrete Surfaces

The licensee shall maintain an impermeable concrete surface in all areas of the facility. The surfaces shall be concreted and constructed to British Standards 8110 or an alternative as agreed by the Agency. The licensee shall remedy any defect in concrete surfaces within 5 days.

There are a number of non-operational areas of the facility that are landscaped and the wording of this condition should be amended to reflect this position. The requirement to remedy any defect in concreted surfaces within 5 days is, given the nature of the waste activities, very onerous. It will be very difficult if not impossible to achieve compliance as all such works will have to be carried out by third party contractor.

Greenstar requests that the wording of the Condition be amended as follows

*The licensee shall maintain an impermeable concrete surface in all **operational** areas of the facility. The surfaces shall be concreted and constructed to British Standards 8110 or an alternative as agreed by the Agency. The licensee shall remedy any defect in concrete surfaces **as soon as is practicable**.*

Condition 3.10.6 Tonnage Limits Per Annum

3.10.6 The licensee may accept up to 10 tonnes per annum of:

-Household Waste

-Hazardous Waste from business customers and other non-household sources, including farms, that, because of its nature or composition to similar household waste at the civic amenity site. The licensee shall have regard to any guidance published by the Agency under the National Hazardous Waste Management Plan.

The 10 tonnes per annum limit is very restrictive. Greenstar requests that the following wording be inserted into the condition after the civic amenity site. ***The amount of waste accepted at the civic amenity site may be increased subject to the Agency's prior approval.***

Condition 3.19.3- Reference to a Containment Pond

3.19.3 In the event of a fire or spillage to storm water, the site storm water shall be diverted to the containment pond. The Licensee shall examine, as part of the response programme in Condition 3.19.2, the provision of automatic diversion of storm water to the containment pond. The licensee shall have regard to any guidelines issued by the Agency with regard to firewater retention.

There is no firewater containment pond at the facility. Greenstar considers that the Condition does not apply to the site and requests that it be deleted.

Condition 3.21- Requirement for On-Site Weather Station

3.21 The licensee shall operate a weather monitoring station on the site at a location agreed by the Agency, which record conditions of wind speed, temperature, rainfall and wind direction.

There is a weather monitoring station in place that continually monitors wind speed and direction. Given the nature of the facility and the proximity of the facility to the Met Eireann stations at Fermoy and Cork Airport, there is no need for on-site measurements of rainfall and temperature.

Condition 5.4- Trigger Levels

5.4 Unless otherwise agreed by the Agency, the trigger levels for storm water discharges from the facility measured at monitoring point SW3 are

BOD 5 mg/l
Suspended Solids 15 mg/l
Ammonia as N 0.14 mg/l

The results of the routine surface water monitoring confirm that there is no evidence that the discharge from the site has had any impact on the receiving watercourse. The trigger levels set in the current licence are BOD 25mg/l and Suspended Solids 35mg/l. There is no trigger level for ammonia.

The results of the testing carried out at SW-3 in 2012 and 2013 are presented in Table 1.

Table 1: Surface Water Monitoring Results 2012-2013.

Parameter	Units	2012				2013				Trigger Levels	Emission Levels
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4		
pH	pH units	8.23	8.37	8.24	8.5	8.36	7.92	7.45		N/A	N/A
Conductivity	mS/cm	0.434	0.249	0.395	0.459	473	458	506		N/A	N/A
Temperature	°C	10.8	13.8	14.1	7.8	9.8	9.7	8.1			
BOD	mg/l	<1	1	<1	<1	3	2	<1		25	N/A
COD	mg/l	9	8	9	8	9	9	24		N/A	N/A
Ammoniacal Nitrogen	mg/l	0.22	0.51	0.33	0.3	0.38	0.25	3.41		N/A	N/A
Dissolved Oxygen	mg/l	9	8	5	5	5	7	2		N/A	N/A
TOC	mg/l	2	4	7	4	<2	5	11		N/A	N/A
TSS	mg/l	<10	27	<10	<10	<10	<10	10		35	N/A
Oils, Fats & Greases	mg/l	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01		N/A	N/A
Nitrate as NO ₃	mg/l	7.1	6.7	16.8	12.9	0.8	14.9	10.7		N/A	N/A
Nitrite as NO ₂	mg/l	0.2	<0.02	0.32	0.25	<0.02	<0.02	0.11		N/A	N/A
Mineral Oils	mg/l	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<10		N/A	5
Total Coliforms	cfu/100ml	24,000	460,000	46,000	43,000	46,000	46,000	2400		N/A	N/A
Faecal Coliforms	cfu/100ml	4,600	460,000	11,000	43,000	4,600	2,400	2400		N/A	N/A

The proposed trigger level for ammonia is significantly lower than the levels recorded at SW-3. Furthermore a BOD of 5mg/l and Suspended Solids level of 15mg/l are more appropriate to rainwater run-off from building roofs rather than open yards and will, if applied, lead to regular notification of an exceedance of a trigger level, while the discharge will not have any measureable impact on the receiving water. This would give an erroneous impression of the compliance status of the facility and in particular of an unfounded risk of surface water pollution.

Greenstar considers that the existing trigger levels are appropriate for the facility, which has a large area of open yards that are heavily trafficked and requests that the current trigger levels for BOD and Suspended Solids be retained and that it is not necessary to establish a trigger level for ammonia.

Condition 6.10.1 Daily visual examination of storm water discharge

6.10.1 *A visual examination of the storm water discharges shall be carried out daily. A log of such inspections shall be maintained on site.*

Greenstar considers that based on the available surface water quality data, daily visual inspections of the storm water discharges are not required. As the discharge is linked to rainfall there will be days when no discharge occurs. Greenstar acknowledges the need to visually assess the quality of the discharge but considers that weekly intervals is appropriate from this facility. Greenstar requests the wording of the Condition be amended to replace 'daily' with 'weekly'.

Condition 6.10.2 - Coliform Contamination Investigation of Storm Drain

6.10.2 *The licensee shall, within six months of the date of grant of licence, investigate the reasons for coliform contamination of the storm water on site.. The scope of the study shall be agreed in advance with the agency, with the final report submitted as part of the AER. The licensee shall implement any recommendations of the report according to the schedule to be set out in the report and to the satisfaction of the Agency.*

Based on the investigations of the storm water drainage system at the site that have already been carried out and reported on to the OEE, Greenstar does not accept that the presence of coliforms in the surface water is indicative of contamination caused by site activities. Greenstar acknowledges there is a need to conduct further investigation of the issue and requests that the wording of the Condition be amended as follows

*The licensee shall, within six months of the date of grant of licence, investigate the reasons for the **presence of coliform bacteria in storm water at the site**. The scope of the study shall be agreed in advance with the agency, with the final report submitted as part of the AER. The licensee shall implement any recommendations of the report according to the schedule to be set out in the report and to the satisfaction of the Agency.*

Condition 8.2 Maintaining Negative Air Pressure At All Times

Negative air pressure shall be maintained at all times in the material transfer building where mixed waste is processed, to ensure there is no significant escape of odours.

The odour abatement system is designed for the continuous extraction and treatment of odorous air inside the building when wastes are being processed. Based on Greenstar's experience, it is not necessary to maintain negative air pressure outside of operational hours. At such times the building doors are closed, which effectively controls odours.

Greenstar requests that the wording of the Condition be amended as follows:

*Negative air pressure shall be maintained at all times in the material transfer building when mixed waste **is being** processed, to ensure there is no significant escape of odours.*

Condition 8.3 Treatment of Odorous Air

Treatment of extracted air from the materials recovery transfer building shall be maintained at all times.

Greenstar considers it is not necessary to continuously maintain negative air pressure and continuously extract air. Greenstar requests that the wording of the Condition be amended to

*Treatment of extracted air from the materials recovery transfer building shall be maintained at all times **when mixed waste is being processed***

Condition 8.15 – Removal of Putrescible Waste.

8.15 All putrescible and odour forming waste stored over night at the facility shall be removed from the facility within 48 hours, except at public holiday weekends. At public holiday weekends, such waste shall be removed within 72 hours of arrival or generation on site.

The OEE has given Greenstar approval to store SRF/RDF at the facility (Attachment 1). The baled SRF/RDF must be stored at the facility until there is enough to transfer to a ship in the Port of Cork. The objective of this Condition is to minimise the risk of odours/leachate generation at the facility. The wrapping of the SRF/RDF bales in plastic sheeting effectively minimises the risk of odours/leachate from the bales and Greenstar requests that the wording of the condition be amended as follows:

*All putrescible and odour forming waste stored over night at the facility shall, **with the exception of the baled RDF/SRF**, be removed from the facility within 48 hours, except at public holiday weekends. At public holiday weekends, such waste shall be removed within 72 hours of arrival or generation on site **unless otherwise agreed in advance with the Agency.***

Schedule C

Table C1.2 specifies quarterly odour and dust monitoring of the activated carbon vessels and dust filtration unit. In 2012 the OEE agreed to reduce the frequency of the testing of the odour abatement system by a specialist third party to an annual event. A copy of the OEE approval confirming the reduction in the frequency is in Attachment 2. As the OEE considers annual testing to be appropriate for the facility, Greenstar requests that the frequency specified for in Schedule C.1.5 be changed from biannual to annual.

Table C.1.3 requires that ambient dust monitoring be carried out quarterly. The current licence requires dust monitoring to be carried out three times a year. The monitoring carried out between 2010 and 2013, the results of which are in Table 2, has established that dust deposition levels have been within the specified limits. Therefore Greenstar considers it is not necessary to increase the monitoring frequency to quarterly and requests the frequency in Table C.1.3 be amended to three times per year.

Table 2: Dust Monitoring Results 2011-2013

Monitoring Point	2010			2011			2012			2013		
	JUNE	JULY	AUGUST	JUNE	JULY	AUGUST	JULY	SEPT	OCT	JUNE	JULY	AUG
D1	202.1	162.2	30.4	166.9	144.2	142.9	282	136	29.6	9.8	16.2	15.9
D2	36.7	88.7	70.6	67.1	52.5	63.1	125	347	19.7	14.9	15.1	7.1
D3	58	80.4	94.1	67.6	65.9	28.7	167	n/A	10.8	1.6	25.1	9.6
D4	150.4	95.5	30.4	140.2	120	100.5	843	418	25.9	9.8	23.9	22.2

Table C.1.4 specifies daily visual inspections of the surface water emissions. As referred to in the objection to Condition 6.10.1 Greenstar considers that based on the monitoring results of the surface water emission, daily visual assessments are not required. Therefore Greenstar requests that the frequency be amended to weekly.

Schedule C.1.5

The existing groundwater monitoring frequency in W0136-02 is annual. While it was increased to biannual in 2006, Greenstar received OEE approval, following a request via ALDER on the 4th April 2013, to revert to annual monitoring. As the OEE considers annual monitoring to be appropriate for the facility, Greenstar requests that the frequency specified for groundwater monitoring in Schedule C.1.5 be changed from biannual to annual.

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Attachment 1

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Dear Mr. Dowling,

I refer to your submission LR000548, "Request to incorporate baling of 200301" relating to the installation of portable processing equipment for the baling and wrapping of MSW (EWC Code: 20 03 01) within the Waste Transfer Building at Sarsfieldcourt and the temporary on-site storage of the resulting bales.

The approval is sought under Condition 3.2.1 of Waste Licence Reg No: W0136-02.

I am to advise you that on the basis of the information provided, the Agency approves your proposal.

You are reminded of the requirement to comply with the Conditions of Waste Licence W0136-02 at all times.

The Agency may at any time, if it considers necessary, revoke this approval.

Yours sincerely,

Joe Hunter

Inspector

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22/05/2012

Our Ref: W0136-02/APW06JH

Dear Mr Dowling,

Request for approval for the baling, wrapping and storage of Refuse Derived Fuel (RDF) at Greenstar, Sarfieldcourt, Glanmire, Co. Cork.

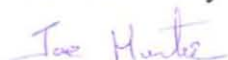
I refer to your request for approval in relation to the above, received by the Agency on 14/05/2012.

Based on the information provided in your proposal, please note that the baling, wrapping and temporary storage of RDF is approved under Condition 3.2.1 contingent on the following:

1. Only residual Municipal Solid Waste which is not suitable for recycling shall be used to produce RDF.
2. Records of the profiling and characterisation of RDF shall be maintained on site and be made available for inspection by the Agency at any time. This shall include the percentage of different waste streams that make up the bales of RDF. Such characterisation shall be carried out monthly.
3. The maximum quantity to be stored on site at any one time shall not exceed 3,000 bales and bales shall be stacked no more than 4 bales high.
4. Bales of RDF shall be dated at the time of production and may be stored on site for a period not exceeding 4 weeks.
5. The storage area for the RDF bales shall be on impermeable hardstand ground.
6. Bales shall be stored in such a way as to minimise and prevent the occurrence of fire, contamination of surface water and the generation of odour and leachate.
7. Full compliance with the Conditions of Waste Licence Reg No: W0136-02.
8. This agreement may be revoked by the Agency at any time.

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

Yours sincerely



Joe Hunter
Inspector
Office of Environmental Enforcement



Attachment 2

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Ms Louise Demir
General Manager
Greenstar Recycling (Munster) Limited
Sarsfieldcourt Industrial Estate
Glanmire
Co. Cork

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25/05/12

Our Ref: W0136-02 /AP05JH

Dear Ms Demir,

I refer to your correspondence dated 10/05/12 and received by the Agency on 18/05/12, requesting a reduction in the frequency of third party monitoring of the odour abatement system.

The proposal as submitted is to the satisfaction of the Agency, subject to the following:

1. Continued in-house monitoring (as described in your proposal) three days weekly.
2. A complete record of all in-house monitoring shall be made available on site for inspection by authorised persons of the Agency, during subsequent inspections and audits.
3. Annual verification testing by independent consultants and submission of completed reports. Such verification testing/monitoring shall be conducted **in advance** of any substantial maintenance works (e.g. carbon replacement) due around that time, in order to ensure the monitoring is representative of normal operating conditions.
4. The Agency will keep the monitoring frequency under review and will take into account the performance of the system based on its own site inspection findings and any complaints that might be received.
5. Full compliance with the requirements of your licence (Waste Licence W0136-02).
6. The above agreement may be revoked at any time by the Agency.

If you have any queries, please contact Joe Hunter on 021 4875540. Please quote the above reference number in future correspondence in relation to this matter.

Yours sincerely,



Joe Hunter
Inspector
Office of Environmental Enforcement

