

Reply ①



12<sup>th</sup> September 2014

Mr Michael Owens  
Inspector  
Office of Climate, Licensing & Resource Use  
Environmental Protection Agency,  
PO Box 3000  
Johnstown Castle Estate,  
County Wexford.

Environmental Protection Agency  
16 SEP 2014

Our Ref: 501-00271-00002  
Your Ref: W0217-02

The Environmental Protection Agency  
17 SEP 2014  
CORR

Dear Michael,

**RE: NOTICE UNDER ARTICLE 16(1) OF THE WASTE MANAGEMENT (LICENSING) REGULATIONS 2004**

Further to your correspondence of 22<sup>nd</sup> July 2014, I wish to offer the following responses on behalf of my client, Killarney Waste Disposal (KWD).

1. KWD processes residual MSW at the facility. This involves trommelling to remove fines that are sent for stabilisation prior to landfill disposal and removal of recyclables such as metals, plastic bottles and cardboard. Some of the residual waste, after processing, has been sent for incineration and this may continue for the next 6 to 9 months, but KWD intends to send all residual waste (after processing) to landfill by (and after) July 2015. The removal and stabilisation of organic fines from residual MSW is consistent with EPA requirements to reduce the biodegradability of MSW disposed in landfill. The oversize residual fraction has a BMW factor of 0.41, reduced from the pre-processing level of 0.63 (2-bin system) or 0.47 (3-bin system), according to EPA guidance on this matter.
2. In advance of the July 2015 effective date for Industrial Emissions licensing, KWD intends to reduce the residual fraction from the dry mixed recyclable (DMR) processing to a level that would not be worth recovering by way of export to incineration or co-incineration. Tighter controls on contamination levels in the DMR bins are planned, with a view to reducing contamination levels to a negligible amount. Rejects from the DMR processing will then be re-circulated on the processing line to maximise the recycling level and minimise the residual fraction, which will then be sent to landfill.

Most of the residual material that is currently generated from the DMR line and used as RDF or SRF is comprised of mixed plastic wrap. Ireland must significantly increase recycling of plastic packaging to meet our obligations under the Packaging and Packaging Waste Directive and Repak has recently confirmed that it will significantly increase the subsidies for recycling this material, commencing on 1<sup>st</sup> January 2015. In view of this, KWD is confident that the viability of recycling of this

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material will improve in 2015 to a level where the rejected material is significantly reduced and not worth exporting for incineration or co-incineration. KWD will also consider sending the DMR residues to other operators or re-processors that specialise in recycling this material.

3. KWD currently sends material to other operators that maximise the recycling of that material prior to disposal/recovery of the residues. It is therefore not possible to provide accurate information on the quantities that are actually incinerated or co-incinerated, but we acknowledge that some of this waste is currently destined for incineration.

In advance of the July 2015 effective date for Industrial Emissions licensing, KWD intends to inform all household customers that "jazz film", e.g., crisp bags, will not be accepted in the DMR bins. Any such contaminants will be dispatched to landfill after July 2015.

4. Current destinations for MSW from the facility include export for incineration, as indicated in your letter. However, KWD intends to send all residual MSW and other residual wastes to landfill (probably Drehid, Ballynagran or Bottle Hill, if open) after the July 2015 effective date for Industrial Emissions licensing.
5. The revised IED Declaration form submitted on 15<sup>th</sup> May 2014 is correct, but we accept that clarification should have been provided in the Form at that time. We suggest that this letter provides that clarification and should be considered as Attachment 1 to the IED Declaration, addressing the question asked on Page 11 of the Form.

If this is not to the satisfaction of the Agency, please send us a Word version of the Form and we will cut and paste text from this letter into the Declaration and have it signed by KWD and returned within 3 days of receipt.

As you are aware, the Industrial Emissions Directive (2010/75/EU) specifies the following Activities in Section 5.3(b) of Annex 1:

"Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, and excluding activities covered by Directive 91/271/EEC:

- (i) biological treatment;
- (ii) pre-treatment of waste for incineration or co-incineration;
- (iii) treatment of slags and ashes;
- (iv) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.

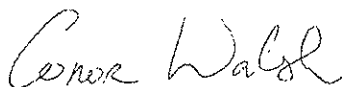
When the only waste treatment activity carried out is anaerobic digestion, the capacity threshold for this activity shall be 100 tonnes per day."

We agree that current activities at the site would fall within the remit of the Industrial Emissions Directive, if carried on after the July 2015 effective date. However, KWD intend to increase the efficiency of recycling at the facility and this will remove the need to send residual waste abroad for recovery. Residual MSW will be sent to landfill in Ireland after July 2015, rather than exported for incineration abroad. In that scenario, the facility can continue to operate under a waste licence rather than an IE Licence.

For these reasons, we ask that you proceed with KWD's application for a revised waste licence, as per the application and further information submitted, to date.

I look forward to your response.

Yours sincerely  
**SLR Consulting Ireland**



**Conor Walsh**  
Technical Director

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