

Approved for submission to the  
Board by Brian Meaney Senior Inspector  
04/12/2014

*Shelton*



## OFFICE OF CLIMATE, LICENSING & RESOURCE USE

### Addendum To An Inspector's Report On A Licence Application

**To:** Directors

**From:** John McEntagart - Environmental Licensing Programme

**Date:** 4<sup>th</sup> December 2014

**RE:** Application for review of an Industrial Emissions licence from **Nurendale Limited**, in relation to a materials recovery facility at Cappagh Road, Cappogue, Finglas, Dublin 11, Licence Register WO261-02.

At the Board meeting on 25 November 2014, the Board sought reconsideration, through further consultation with the OEE, of conditions 8.1 to 8.4 of the RD. This report presents the outcome of those discussions and also takes into consideration the comments made by the Board on 25 November 2014.

The OEE also provided feedback on a large number of other conditions in the RD. A number of consequent recommendations are made below.

Table 1 Recommended changes to Conditions 8.1 to 8.4 of the RD.

Condition number	Proposed change
8.1	[No change is proposed]
8.2	[No change is proposed]
8.3 Waste Storage Plan	
8.3.1	The licensee shall, within 3 months of date of grant of licence, establish, maintain <b>and implement</b> , to the satisfaction of the Agency, a Waste Storage Plan for all waste stored and held at the installation.  [Amend conditions in licence so that plans, procedures, etc. shall be 'maintained and implemented'.]
8.3.2	The Waste Storage Plan shall include: <ul style="list-style-type: none"> <li>• a limit on the volume of waste to be stored or held in designated <b>storage</b> areas;</li> <li>• maximum stockpile sizes <b>in designated storage areas</b>;</li> <li>• a limit on the maximum storage or holding period for waste in</li> </ul>

	<p>designated <b>storage</b> areas; and</p> <ul style="list-style-type: none"> <li>• <b>any other requirements arising from recommendations of the Fire Risk Assessment required by Condition 9.4 of this licence.</b></li> </ul> <p>[Five bullet points are proposed for deletion. Minor amendments are proposed for two existing bullet points, with one being split into two bullet points, as presented in bold text above. A new bullet point, in bold text, is proposed to create an explicit link to a new condition 9.4 proposed below. See below for details].</p>
8.3.3	[No change is proposed]
8.3.4	[No change is proposed]
8.3.5	<p>All designated areas for storage or holding of waste shall be:</p> <ul style="list-style-type: none"> <li>• clearly labelled;</li> <li>• appropriately segregated; and</li> <li>• visibly or physically delineated by walls, dividers, painted lines or marks on the ground or other methods acceptable to the Agency.</li> </ul> <p>[Deletion is proposed from the second bullet point of “where necessary for environmental or safety reasons”]</p>
8.4 Wrapping of baled municipal waste	
8.4.1	<p>The wrapping of baled municipal waste, RDF, SRF and other waste shall be carried out in such a manner that:</p> <ul style="list-style-type: none"> <li>• the waste is fully contained,</li> <li>• the <b>emission</b> of odour from the wrapped bales is prevented,</li> <li>• access by vermin is prevented, and</li> <li>• the <b>discharge</b> of contaminated run-off from the wrapped bales is prevented.</li> </ul> <p>[Two minor amendments to text are proposed, presented in bold text above].</p>
8.4.2	<p>Each bale shall be labelled with:</p> <ul style="list-style-type: none"> <li>• its date of production,</li> <li>• its content and EWC code and</li> <li>• <b>the name of the facility</b> and its licence register number (W0261-01).</li> </ul> <p>[It is proposed that this condition is broken out into bullet points and the final bullet point clarified].</p>
8.4.3	<p>The licensee shall maintain <b>and implement</b> operating procedures for the baling and wrapping of waste.</p> <p>[Amend conditions in licence so that plans, procedures, etc. shall be ‘maintained <u>and implemented</u>’.]</p>
8.4.4	<p>Delete the condition.</p> <p>[It is proposed that condition 8.4.4 is deleted on the basis that the</p>

	operating procedures required by condition 8.4.3 should satisfy the basic requirements of condition 8.4.1 without the need for further elaboration].
8.4.5	The integrity of each wrapped bale shall be checked <b>fortnightly</b> and prior to its dispatch from the installation. Any damaged bales shall be repaired within 24 hours <b>of damage being detected</b> . No damaged bales shall be dispatched from the installation. <b>Records of these checks and repairs shall be maintained at the installation.</b> [It is proposed that condition 8.4.5 is expanded to clarify the frequency of checking of bales and require the maintenance of records].
9.4	<b>The licensee shall arrange, within three months of the date of grant of this licence and every three years thereafter, for the completion, by an independent and appropriately qualified consultant, of a fire risk assessment for the facility. The assessment shall examine all relevant factors on site that impinge on fire risk and prevention. The assessment shall have regard to the EPA Guidance Note: Fire Safety at Non-Hazardous Waste Transfer Stations, 2013. A report on the fire risk assessment shall be prepared within six months of the date of grant of this licence. Any recommendations in the fire risk assessment shall be implemented by the licensee.</b> [It is proposed to insert this new condition into the licence].

#### Other conditions of the RD

Following discussion with the OEE, a number of other amendments to the RD are proposed, as per Table 2.

Table 2. Recommended changes to other parts of the RD.

Condition number	Proposed change
Glossary	Insert new term " <b>Residual waste</b> " in the glossary, to be defined as:  "The fraction of collected waste remaining after a treatment or diversion step, which generally requires further treatment or disposal, <b>including mixed municipal waste.</b> "
2.2.1	The licensee shall maintain <b>and implement</b> an Environmental Management System (EMS), which shall incorporate energy efficiency management. The EMS shall be reviewed for suitability, adequacy and effectiveness and updated on an annual basis.  [Amend conditions in licence so that plans, procedures, etc. shall be 'maintained <u>and implemented</u> ']
2.2.2.3	Schedule of Environmental Objectives and Targets.  The licensee shall maintain <b>and implement</b> a Schedule of Environmental Objectives and Targets <b>to the satisfaction of the Agency</b> . The schedule shall, as a minimum, provide for a review of all operations and processes, including an evaluation of practicable

	<p>options, for energy and resource efficiency, the use of cleaner technology, cleaner production and the prevention, reduction and minimisation of waste and shall include waste reduction targets. The schedule shall include time frames for the achievement of set targets and shall address a five-year period as a minimum. In relation to waste recovery the schedule shall include an initial waste recovery target for waste accepted, as well as time frames for achieving higher recovery targets. The schedule shall, as a minimum, include specific objectives for the control and minimisation as well as an annual review of the dust, odour and noise nuisance potential of the site activities. The schedule shall be reviewed annually and amendments thereto notified to the Agency as part of the Annual Environmental Report (AER).</p> <p>[Amend conditions in licence so that plans, procedures, etc. shall be 'maintained <u>and implemented</u>'.]</p> <p>[Amend conditions in licence which require agreement of the Agency where it suffices to require 'to the satisfaction of the Agency'.]</p>
2.2.2.4	<p>Environmental Management Programme (EMP)</p> <p>The licensee shall maintain <b>and implement</b> an EMP, including a time schedule, for achieving the Environmental Objectives and Targets prepared under Condition 2.2.2.2. <b>The EMP, which shall be to the satisfaction of the Agency,</b> shall include:</p> <ul style="list-style-type: none"> <li>▪ designation of responsibility for targets;</li> <li>▪ the means by which they may be achieved;</li> <li>▪ the time within which they may be achieved.</li> </ul> <p>The EMP shall be reviewed annually and amendments thereto notified to the Agency as part of the Annual Environmental Report (AER).</p> <p>A report on the programme, including the success in meeting targets, shall be prepared and submitted to the Agency as part of the AER. Such reports shall be retained on-site for a period of not less than seven years and shall be available for inspection by authorised persons of the Agency.</p> <p>[Amend conditions in licence so that plans, procedures, etc. shall be 'maintained <u>and implemented</u>'.]</p> <p>[Amend conditions in licence which require agreement of the Agency where it suffices to require 'to the satisfaction of the Agency'.]</p>
2.2.2.5(i)	<p>The licensee shall maintain <b>and implement</b> an environmental management documentation system which shall be to the satisfaction of the Agency.</p> <p>[Amend conditions in licence so that plans, procedures, etc. shall be 'maintained <u>and implemented</u>'.]</p>
2.2.2.6	<p>The licensee shall establish, <b>maintain and implement</b> procedures</p>

	<p>to ensure that corrective and preventative action is taken should the specified requirements of this licence not be fulfilled. The responsibility and authority for persons initiating further investigation and corrective and preventative action in the event of a reported non-conformity with this licence shall be defined.</p> <p>[Amend conditions in licence so that plans, procedures, etc. shall be 'implemented' as well as maintained/established.]</p>
2.2.2.7	<p>Internal Audits</p> <p>The licensee shall establish, maintain <b>and implement</b> a programme for independent internal audits of the EMS. Such audits shall be carried out at least once every three years. The audit programme shall determine whether or not the EMS is being implemented and maintained properly, and in accordance with the requirements of the licence. Audit reports and records of resultant corrective and preventative actions shall be maintained as part of the EMS in accordance with condition 2.2.2.5.</p> <p>[Amend conditions in licence so that plans, procedures, etc. shall be 'maintained and implemented'.]</p>
2.2.2.8	<p>Awareness and Training</p> <p>The licensee shall maintain <b>and implement</b> procedures for identifying training needs, and for providing appropriate training, for all personnel whose work can have a significant effect upon the environment. Appropriate records of training shall be maintained.</p> <p>[Amend conditions in licence so that plans, procedures, etc. shall be 'maintained and implemented'.]</p>
2.2.2.9	<p>Communications Programme</p> <p>The licensee shall maintain <b>and implement</b> a Public Awareness and Communications Programme to ensure that members of the public can obtain information at the facility, at all reasonable times, concerning the environmental performance of the facility.</p> <p>[Amend conditions in licence so that plans, procedures, etc. shall be 'maintained and implemented'.]</p>
2.2.2.10	<p>Maintenance Programme</p> <p>The licensee shall maintain <b>and implement</b> a programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment. Appropriate record keeping and diagnostic testing shall support this maintenance programme. The licensee shall clearly allocate responsibility for the planning, management and execution of all aspects of this programme to appropriate personnel (see Condition 2.1 above). The maintenance programme shall use appropriate techniques and measures to ensure the optimisation of energy efficiency in plant and equipment.</p> <p>[Amend conditions in licence so that plans, procedures, etc. shall be</p>

	'maintained <u>and implemented</u> '.]
2.2.2.11	<p>Efficient Process Control</p> <p>The licensee shall maintain <b>and implement</b> a programme to ensure there is adequate control of processes under all modes of operation. The programme shall identify the key indicator parameters for process control performance, as well as identifying methods for measuring and controlling these parameters. Abnormal process operating conditions shall be documented, and analysed to identify any necessary corrective action.</p> <p>[Amend conditions in licence so that plans, procedures, etc. shall be 'maintained <u>and implemented</u>'.]</p>
3.9.2	<p>Within three months from the date of grant of this licence, the licensee shall <b>maintain an inventory, to the satisfaction of the Agency</b>, detailing the duty and standby capacity in tonnes per day, of all waste handling and processing equipment to be used at the facility. These capacities shall be based on the licensed waste intake, as per <i>Schedule A: Limitations</i>, of this licence.</p> <p>[Amend conditions in licence which require agreement of the Agency where it suffices to require 'to the satisfaction of the Agency'.]</p>
3.10.3	<p>Waste water stored in the on-site storage tanks shall be tankered off-site in fully enclosed road tankers to a Wastewater Treatment Plant <b>that is satisfactory to the Agency</b>.</p> <p>[Amend conditions in licence which require agreement of the Agency where it suffices to require 'to the satisfaction of the Agency'.]</p>
3.12.2(i)	<p>Dust curtains (or equivalent approved by the Agency) shall be maintained on the entry/exit points from the waste transfer building; all other doors in this building shall be kept closed <b>when not in use</b>.</p> <p>[Amend condition to make it easier to enforce.]</p>
3.12.2(ii)	<p>Unless otherwise agreed by the Agency, all buildings for the storage or treatment of <b>residual or food</b> waste shall be maintained at negative air pressure with ventilated gases being subject to treatment as necessary or as may be specified by the Agency.</p> <p>[Replace the term "putrescible" with the term "residual or food".]</p>
3.12.2 (iii)	<p>The licensee shall maintain, to the satisfaction of the Agency, a programme to demonstrate negative pressure and building envelope integrity throughout all buildings where <b>residual or food</b> waste is deposited, stored or treated to ensure that there is no significant escape of odours. The programme shall also maintain all criteria for the operation and control of negative pressure. This programme shall be reviewed at least annually.</p>

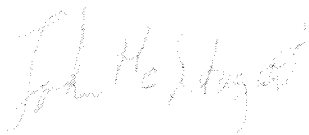
	[Replace the term "putrescible" with the term "residual or food".]
3.24.1	<p><b>Waste shall be accepted at or dispatched from the installation only between the hours of 6:00 and 23:00 Monday to Saturday inclusive, unless otherwise agreed by the Agency.</b></p> <p>[Remove the reference to 'emergencies']</p>
6.10	<p>The drainage system (e.g. gullies, manholes, any visible drainage conduits and such other aspects as may be agreed) and bunds, silt traps and oil separators shall be visually inspected weekly and desludged as necessary. All sludge and drainage from these operations shall be collected for safe disposal. The drainage system, bunds, silt traps and oil interceptors shall be properly maintained at all times. <b>The licensee shall maintain a drainage map on site to the satisfaction of the Agency. The drainage map shall be reviewed annually and updated as necessary.</b></p> <p>[Amend condition to ensure Agency has access to an up to date drainage map]</p>
6.13	<p>Pollutant Release and Transfer Register (PRTR)</p> <p>The licensee shall prepare and report a PRTR for the site. The substance and/or wastes to be included in the PRTR shall be <b>determined</b> by reference to EC Regulations No. 166/2006 concerning the establishment of the European Pollutant Release and Transfer Register. The PRTR shall be prepared in accordance with any relevant guidelines issued by the Agency and shall be submitted electronically in specified format and as part of the AER.</p> <p>[Amend conditions in licence which require agreement of the Agency.]</p>
6.16.1	<p>All <b>residual, food</b> and <b>other</b> odour-forming waste, <b>other than baled and wrapped waste</b>, shall be removed from the facility within 48 hours <b>of its arrival or generation on site</b>, except at Public Holiday weekends. At Public Holiday weekends, this waste shall be removed within 72 hours of its arrival <b>or generation</b> on site.</p> <p>[Replace the term "biodegradable" with "residual and food", presented in bold above. Delete requirement to store in buildings or in suitably covered and enclosed containers as this is dealt with by condition 8.2 of the RD.]</p>
6.16.3	<p>The licensee shall undertake, as required by the Agency, an odour assessment which shall include as a minimum the identification and quantification of all significant odour sources and an assessment of the suitability and adequacy of the odour abatement systems installed to deal with these emissions. Any recommendations arising from the odour assessment shall be implemented <b>to the satisfaction of</b> the Agency.</p> <p>[Amend conditions in licence which require agreement of the Agency where it suffices to require 'to the satisfaction of the</p>

	Agency'.]
6.17.1	<p>The floor of the waste transfer buildings shall be cleaned on a weekly basis and on a daily basis where <b>residual or food</b> waste is handled. The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied, or as a minimum on a weekly basis. <b>The licensee shall maintain a record of cleaning of the waste transfer buildings and storage bays at the installation.</b></p> <p>[Replace the term "putrescible" with "residual or food". Insert new sentence requiring a record of cleaning activities to be maintained. Amendments presented in bold above.]</p>
6.20	<p>Soil Monitoring</p> <p>The licensee shall carry out soil monitoring at the site of the installation, <b>within ten years of date of grant of licence and</b> at least once every ten years <b>thereafter</b>. The sampling and monitoring shall be carried out in accordance with any guidance or procedure as may be specified by the Agency.</p> <p>[Amend condition so it is clear when first round of soil sampling should take place.]</p>
6.21	<p>Vermin and Flies</p> <p>In advance of the acceptance of <b>residual or food</b> waste, the licensee shall <b>maintain and implement to the satisfaction of the Agency a programme</b> for the control and eradication of vermin and fly infestations at the facility. <b>The programme shall</b> include as a minimum, operator training, details on the rodenticides and insecticides to be used, mode and frequency of application and measures to contain sprays within the <b>installation</b> boundary.</p> <p>[Replace the term "putrescible" with the term "residual or food".]</p> <p>[Amend conditions in licence which require agreement of the Agency where it suffices to require 'to the satisfaction of the Agency'.]</p>
8.5.6	<p>The licensee shall develop, maintain <b>and implement</b> detailed written procedures and criteria for:</p> <ul style="list-style-type: none"> <li>(i) characterisation, compliance testing, acceptance, on-site verification and handling of all wastes arriving at the installation;</li> <li>(ii) rejection of unacceptable incoming waste; and</li> <li>(iii) ensuring adequate storage capacity exists in advance of waste acceptance.</li> </ul> <p>[Amend conditions in licence so that plans, procedures, etc. shall be 'maintained <u>and implemented</u>'.]</p>
10.2.1	<p>The licensee shall prepare, to the satisfaction of the Agency, a fully detailed and costed plan for the decommissioning or closure of the site or part thereof. This plan shall replace the existing</p>



	<p>Decommissioning Plan and shall be submitted to the Agency <b>within six months of date of</b> grant of this licence.</p> <p>[Amend condition so that DMP is submitted as stand-alone document instead of as part of AER.]</p>
Schedule A.1	<p>The following waste related processes are authorised:</p> <p>Recovery of <b>wastes listed in Schedule A.2</b></p> <p><b>Baling and wrapping of waste</b></p> <p><b>Storage of waste</b></p> <p>No additions to these processes are permitted unless agreed in advance with the Agency.</p> <p>[Amend description of waste related processes authorised at the installation.]</p>
Schedule A, Table A.1 Waste Categories and Quantities	<p>Amend waste type "Biodegradable Waste (EWC 20 01 08)" in Table A.1 to read "Biodegradable kitchen and canteen waste (EWC 20 01 08)".</p> <p>[Amendment is proposed in order to be more specific regarding the waste type that may be accepted at the installation and to be consistent with the European Waste Catalogue.]</p>
Schedule A.2, Table A.1 Waste Categories and Quantities	<p><b>Combustible waste (EWC 19 12 10)</b></p> <p>[Amend the term 'Combustive waste (EWC 19 12 12)' in the table to read as per licence application.]</p>
Schedule C.4 Note 1	<p>Note 1: Parameters and frequency for compliance testing to be agreed under Condition <b>8.5</b>.</p> <p>[Amend note 1 to refer to correct condition]</p>

Signed




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John McEntagart

