

Town Clerk
Drogheda Landfill
City Council Offices
Fair St
Drogheda
Co Louth



27th June 2006

Our Ref: M33-1/NC12EM

Notification of Non-Compliance

Dear Sir

The non-compliance with Waste Licence Register No. 33-1 as detailed in the attached site inspection report (reference no. 33-1/06/SI14EM) from a site inspection conducted by Mr. E. Merriman and Mr. Leo Sweeney on 15/06/2006 has been noted by the Agency.


ACTION REQUIRED

In view of the above you are required to:

- The observations listed in the report should be addressed by the licensee and reported back to the Agency.

You should be aware that failure to comply with the conditions of a waste licence is an offence under the Waste Management Act 1996. Failure to comply with the requirements specified in this notification of non-compliance will lead to further enforcement action by the Agency. Please quote the above reference in future correspondence in relation to this matter. If you have any queries please contact Eamonn Merriman at the Dublin Regional Inspectorate.

Yours sincerely



Eamonn Merriman
Inspector
Office of Environmental Enforcement

*9 reviewed
Please arrange immediate
follow-up & response to EPA.
29/6/06*



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Site Inspection Report



Town Clerk
Drogheda Landfill
Drogheda Borough Council
City Council Offices
Fair St
Drogheda
Co Louth

Licence Register No:	33-1	Inspection Reference No:	33-1/06/SI14EM
Date of Inspection:	15/06/2006	Inspectors:	Eamonn Merriman Leo Sweeney
Date of issue of Inspection Report:	27/06/06	Announced:	No

F.A.O: Mr. Darius Messayeh

This Site Inspection Report details the Agency's findings following an inspection of Drogheda Landfill and Civic Waste Facility on 15/06/2006.

NOTIFICATION OF NON-COMPLIANCE

Drogheda Landfill has been found to be in non-compliance with the conditions of the Waste Licence as set out in this Site Inspection Report. You are required to undertake the corrective actions specified to close out the Non-Compliances and Observations raised in this Report or further enforcement action may be taken by the Agency.

In view of the above you are required to submit a schedule to the Agency within 14 working days of receipt of this Report detailing how the non-compliances and observations specified therein are to be rectified. Please quote the above Inspection Reference Number in any future correspondence in relation to this Report. If you have any further queries please contact Eamonn Merriman at 01-2680100.

1. SITE INSPECTION AND ASSESSMENT

The Site Inspection commenced at 11:15 a.m. and the following were in attendance:



Representing V&W Recycling *

Mr. William Martin CWF General Overseer
Ms. Imelda Smith CWF Site Manager

Representing the Environmental Protection Agency:

Mr. Eamonn Merriman Inspector
Mr. Leo Sweeney Inspector

* V&W Recycling operate the Civic Waste Facility on behalf of Drogheda Borough Council.

An Inspection of the site was conducted, special attention was paid to waste storage, landscaping and signage. Four photographs were taken (attached).

Interview

The following representatives were interviewed during the Inspection:

Name	Position	Issue
Mr. William Martin	CWF General Overseer	Various
Ms. Imelda Smith	CWF Site Manager	Waste Acceptance and Handling Procedure

General Comment

The Agency welcomes the development of a Civic Waste Facility. However, the Agency notes that the Civic Waste Facility has been accepting waste without the agreement of the Agency to do so.

The licensee was briefed on the Agency's reporting procedures and was advised that a Site Inspection Report would be issued.

Finally, the licensee was thanked for the courteous and co-operative manner of the staff, and the assistance and co-operation extended during the Inspection.

2. INSPECTION FINDINGS

Inspection Non-Compliances

The site inspection process is a random 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.

The licensee was found to be in non-compliance with the requirements of the Licence in respect of the following on the day of the Inspection (Schedule and Condition numbers refer to the Licence):

1. **Acceptance of Waste at the Civic Waste Facility (CWF) Without Agency Agreement**

Waste has been accepted for recovery and for disposal at the CWF since 31/05/06. However, the Agency has not yet given permission to accept waste at the CWF. The Agency also notes that it had previously clarified to the licensee that waste could not be accepted at the CWF prior to the Agency's agreement.

This is in non-compliance with **CONDITION 5.9.a).**

Corrective Action Required

Ensure compliance with the conditions of waste licence register No. 33-1.

The Agency notes that based on the CQA Validation Report for the CWF which was submitted to the Agency on 13/06/06, your letter of 06/06/06 submitted to the Agency by fax on 07/06/06 and the proposals for facilities to which waste may be dispatched submitted 12/06/06 by fax, the Agency agrees that waste may now be accepted at the CWF in accordance with Condition 5.9.a).

Inspection Observations

While these observations do 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. Where requested the actions taken and clarifications requested should be reported back to the Agency.

1. Waste Acceptance and Handling procedure.

Following the Agency's agreement of the Waste Acceptance and Handling Procedure for the Civic Waste Facility subject to certain revisions being made, the licensee submitted a revised procedure to the Agency on 13/06/06. However, further modification of this latest version is required to satisfy the Agency. The Agency also agrees that waste may be accepted for disposal at the CWF into the compactor (refer to photograph 4).

Corrective Action Required

Implement the revisions to the Waste Acceptance and Handling Procedure as discussed with Ms. Imelda Smith and Mr. William Martin during the site inspection. Maintain the revised procedure for inspection at the facility office and ensure all staff are aware of its contents.

2. Lack of Weatherproof Covering for Certain Categories of Waste Electronic and Electrical Equipment (WEEE)

Computers and televisions were stored in wire cages supplied by the WEEE contractor outdoors (refer to photograph 2). This storage arrangement does not provide appropriate weatherproof covering as required by the Sixth Schedule of the WEEE regulations.

Corrective Action Required

Resolve this issue with the WEEE contractor.

3. FOLLOW-UP ACTIONS

The licensee shall take the actions required to close out the non-compliances and 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.

Report prepared by
Inspector:

Eamonn Morrison

Date:

27/06/06

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