

Objection No. 7

Noeleen Keavey

From: Licensing Staff
Sent: 29 June 2016 14:18
To: Noeleen Keavey
Subject: FW: New Applicant objection entered for Reg no: W0140-04. (Reference Number: W0140-04-160629122541)
Attachments: W0140-04 Objection.pdf
Importance: High

Hi Noeleen,

See below, received in Licensing inbox.

Thanks,

Christina

From: David Naughton [<mailto:david.naughton@nurendale.ie>]
Sent: 29 June 2016 12:26
To: Licensing Staff
Subject: New Applicant objection entered for Reg no: W0140-04. (Reference Number: W0140-04-160629122541)
Importance: High

Objection submitted on: 29/06/2016 12:25
Title: Mr
First Name: David
SurName: Naughton
Organisation Name: Nurendale
Address Line 1: Rathdrinagh
Address Line 2: Beauparc
Address Line 3:
County: Meath
Post Code: 0000
Email: david.naughton@nurendale.ie
Objector Type: Applicant
Oral Hearing: No

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Objection To
Proposed Decision
Industrial Emissions Licence Register No W0140-04

Prepared By

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Prepared For

Nurendale T/A Panda Waste Services
Rathdrinagh
Beauparc
County Meath.

June 2016

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1. INTRODUCTION

Nurendale trading as Panda Waste Service (PANDA) wishes to object under Section 87 (5) of the EPA Act of 1992, as amended, to a number of the Conditions in the Proposed Decision (PD) for Industrial Emissions Licence Register Number P0140-04 for its installation at Beauparc, Navan, County Meath.

Section 2 contains the grounds for the objections. The proposed Conditions are presented in italics followed by PANDA's grounds for objection. The appropriate objection fee (€253) has been electronically transferred to the Agency.

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2. GROUNDS FOR OBJECTION

Condition 3.6.2

The licensee shall maintain an impermeable concrete surface in all areas of the installation associated with the movement, processing, storage and handling of waste, compost, digestate other materials and emissions. The surfaces shall be concreted and constructed to British Standard 8110 or an alternative as agreed by the Agency. The licensee shall remedy any defect in concrete surfaces within five working days.

PANDA recognises the need to maintain impermeable concrete surfaces in all areas where wastes are handled and stored; however, it is not practical to remedy all defects within five working days, as some works may require the use of a building contractor not based at the installation. PANDA requests that the time for the remedying of defects be extended to 8 weeks.

Condition 3.10.5

The quantity of waste to be accepted at the installation on a daily basis shall not exceed the duty capacity of the equipment at the installation. Any exceedance of this intake shall be treated as an incident.

At present PANDA accepts and stores wastes prior to processing and in some cases, for example construction and demolition (C&D) waste, the amounts taken in and stored exceed the daily duty capacity of the processing equipment; but does not exceed the overall capacity of the equipment to process the waste in a manner that does not give rise to any risk of environmental pollution. The condition, as worded, would result in daily notifications of incidents to the Agency, with the potential for an incorrect public perception of operations. PANDA requests that wording be amended as follows

The quantity of waste to be accepted at the installation shall not exceed the duty capacity of the equipment at the installation. Any exceedance of this intake shall be treated as an incident.

Condition 3.11.2 (b)

All buildings, vessels and other structures for the storage to treatment of residual, food and odour forming waste shall be maintained at negative air pressure with ventilation gases being subject to treatment

Notwithstanding the absence of functioning negative air systems, the current operations are not a source of either odour nuisance or impairment of amenities outside the site boundaries. PANDA considers that negative air systems are only required for buildings accepting residual and food waste. PANDA considers that the manufacture of solid recovered fuel (SRF) from Commercial and Industrial and C&D waste does not require a negative air system

The condition as worded means that upon the grant of the licence PANDA would have to cease operations in Buildings 1 and 3 until negative air systems are installed/operational. While PANDA recognises the need to effectively control odours, it considers that negative air systems are not required at the site to ensure the waste activities do not give rise to odour nuisance.

PANDA notes Condition 6.16.1 which requires the completion of an odour impact assessment within 12 months of the date of grant of the licence. The assessment shall identify and quantify all significant odour sources and shall include an assessment of the suitability and adequacy of the odour control system. Any recommendations arising from the odour impact assessment shall be implemented following agreement by the Agency.

In the context of the above PANDA requests that Condition 3.11.2 (b) be amended as follows:

All buildings, vessels and other structures for the storage to treatment of residual, food and odour forming waste shall be maintained at negative air pressure with ventilation gases being subject to treatment, except where the odour impact assessment undertaken in accordance with Condition 6.16.1 identifies that negative air ventilation systems are not required to ensure that waste activities do not give rise to odour nuisance outside the site boundaries.

Condition 3.11.2 (c)

The biofilter associated with Building 1 shall not be operated.

While it is not intended in the short term to operate the biofilters, it may be required at some time in the future, for example in the context of the findings of the odour impact assessment required under Condition 6.16.1. PANDA requests that the Condition be amended as follows:

The biofilter associated with Building 1 shall not be operated without the prior approval of the Agency.

Condition 3.15 Construction and Demolition Waste Recovery (Building 2)

PANDA considers that this condition could potentially limit the waste activities that may be carried out in Building to the recovery of construction and demolition waste. From a business point of view, PANDA needs the flexibility to use the buildings for a range of different waste processes, subject to the Agency's prior approval. PANDA requests that the reference to Building 2 be omitted from the Condition.

Condition 6.12

All wastewater/leachate/contaminated stormwater gullies, drainage grids and manhole covers shall be painted with red squares, whilst all clean stormwater gullies, drainage grids and manhole covers shall be painted with blue triangles. These colour codes shall be maintained so as to be visible at all times during installation operation, and any identification designated in this licence (i.e SW1) shall be inscribed on these manholes.

While this is a standard condition it has been PANDA's experience that it is not practical to maintain the colour coding to be visible at all times. This is primarily due to wearing of the paint due to vehicle trafficking. At another of its licensed facilities, PANDA received a notification of non-compliance for failing to maintain colour coding. In the context of the scoring system that underpins the development of the Agency's national priority site list, this non-compliance is on a par with the receipt of a complaint from a member of the public, which PANDA considers to be unfair.

PANDA recognises that it is important to be able to differentiate between the foul and surface water systems on the ground and considers this can be facilitated by maintaining up to date colour coded drawings in the site office.

PANDA requests the Condition be amended as follows:

*All wastewater/leachate/contaminated stormwater gullies, drainage grids and manhole covers shall be painted with red squares, whilst all clean stormwater gullies, drainage grids and manhole covers shall be painted with blue triangles. The colour codes shall be maintained so as to be visible **in so far as is practical** during installation operation, and any identification designated in this licence (i.e. SW1) shall be inscribed on these manholes. **The location and colour coding of the gullies, drainage grids and manhole covers shall be shown on a drawing that shall be maintained in the site office***

Condition 8.11.7

A record of all inspections of incoming waste loads shall be maintained.

All wastes arriving at the site are inspected in accordance with the requirements of Condition 8.11.6 and the weighbridge records are maintained; however it is not practical to record the findings of the inspection of each individual load that is tipped inside the building, as this would require an operative to be dedicated to full time recording of each load and would slow operations while the inspection sheet is being completed. PANDA requests the Condition be amended to be the same as Condition 8.11.3 on the current licence.

Condition 8.11.9

Unless otherwise agreed by the Agency the licensee shall not dispose of any waste that has been accepted at the installation for the purpose of a recovery activity. The condition shall not apply to non-recyclable waste that is separated for disposal by the licensee from the incoming waste.

The solid recovered fuel (SRF) manufactured at the installation is sent to cement kilns for use as a fuel. In the past, there have been instances where a number of the kilns have simultaneously shut down for maintenance/repair. In this scenario, the SRF is baled and stored pending the kilns coming back on line. In the event the kilns are out of commission for an extended period the storage capacity may be exceeded and the only option would be to send the SRF to landfill for disposal.

Condition 8.12.1

All waste treatment, processing and storage shall be carried out inside a building or enclosed vessel or, in the case of storage of recycled construction and demolition waste, in an appropriately enclosed or covered area.

This condition prohibits the external storage of waste. Condition 8.10 of the current licence allows the external storage of stable non-nuisance and non-polluting wastes (concrete, chipped wood, bailed plastic and cardboard and other similar approved) external of the buildings in agreed areas/containers. It was not an objective of the review application to remove the capacity to store wastes externally. PANDA requests that the Condition be amended to allow the continued external storage of waste, as authorised under the existing Condition 8.10.

Condition 8.12.11

There shall be no storage of biogas at the installation.

This condition prohibits the storage of biogas at the installation. While it not proposed to store bio-gas in bulk at the site bio gas will be stored in the head space of the anaerobic digesters.

The Notice issued under Article 16(1)(a)(i) of the Waste Management Licensing Regulations, dated 15th April 2011 requested inter alia Item 6 Confirm the maximum volume of bio-gas to be stored at any one time at the facility. The response, dated 23rd May 2012, was as follows:

Bio-gas will not be stored in bulk at the site. The bio-gas generated in the fermenters will occupy the head space above the waste from where it will be drawn to the CHP plant. The total area occupied by the fermenters is 2,992m². Assuming a head space of 1.5m, and that all of the fermenters are operational, the maximum volume of bio-gas stored at any one time will be 4,488m³. It should be noted that the maximum volume in the headspace in any one of the fermenters will be 321m³ and the pressure will be 25mbar.

PANDA requests the condition be amended as follows:

*There shall be no storage of biogas at the installation **other than in the fermenters.***

Condition 8.18.4

Bales of waste shall be dispatched from the installation in order of the date of first production of the bale, as labelled in accordance with condition 8.18.3, unless otherwise agreed by the Agency.

While PANDA understands the rationale and agree with labelling of bales for this requirement, it is only practical where the bales are stored either in the open or in buildings that have access front and rear. In the case of storage with access from one direction only, the first (oldest) bales are placed in the back, with the subsequent (or newer) bales stacked moving from the back to the front.

This means that when the bales are being transferred, the older bales i.e. the ones at the back, cannot be dispatched first as it is not possible to get access to them. However, storing the bales of SRF externally would facilitate compliance with this condition and PANDA requests the Agency consider this when assessing the request to alter Condition 8.12.1.

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