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Ms Noeleen Keavey
Environmental Licensing Unit,
Office of Environmental Sustainability,
Environmental Inspection Agency,
PO Box 3000,
Johnstown Castle Estate,
County Wexford.

21st December 2017

Re: Application for Waste Licence (W0217-02) Killarney Waste Disposal

Dear Ms Keavey,

I refer to the Agency's Notice dated the 25th October 2017 in accordance with Article 16 (1) of the Waste Management (Licensing) Regulations 2004, as amended. On behalf of Killarney Waste Disposal (KWD Recycling) I enclose one original and one hardcopy of the response. Also enclosed are two CD-ROM discs containing files of the application in searchable PDF format. The content of the electronic files is a true copy of the original application form and the supporting attachments.

The EPA's requests are set out in italics followed by the response.

- 1. Provide evidence in the form of a summary of existing information or the preparation of new information that the waste licence review application contains the requirements of Article 12(1)(a) to (v) inclusive, of the Waste management (Licensing) Regulations 2004, as amended.*

Evidence that the licence review application contains the requirement of Article 12 (1) (a) to (v) inclusive is in Attachment 1.

- 2. Provide updated drawings showing the current and future (proposed) layout of the facility.*

An updated drawing showing the current layout of the facility is in Attachment 2. It is no longer proposed to accept and process end of life vehicles.

3. *Provide an updated drawing showing the site boundary, ensuring that the site boundary is within the area covered by planning permission for the facility, and that all current and proposed waste activities are confined to this area.*

The drawing in Attachment 2 shows the site boundary. It is within the area covered by the planning permission for the facility and all current activities are confined to this area.

4. *Provide the information required in the tables and complete the tables at the following link: <http://www.epa.ie/pubs/forms/lic/applicationtemplates/>*

The relevant tables are in Attachment 3.

5. *Describe the measures to be taken on and following the permanent cessation of the activity or part of the activity to avoid any risk of environmental pollution and to return the site of the activity to a satisfactory state. In support of this response, provide:*
 - *an environmental liabilities risk assessment (ELRA) and a closure, restoration and aftercare management plan (CRAMP) in accordance with Guidance on assessing and costing environmental liabilities published by the EPA in 2014; and*
 - *a proposal for financial provision to cover the costs identified in the ELRA and CRAMP in accordance with the Guidance on Financial Provision for Environmental Liabilities (EPA, 2015).*

An Environmental Liability Risk Assessment and Decommissioning Management Plan have been prepared and submitted to the Office of Environmental Enforcement, and a copy is in Attachment 4.

6. *Provide an assessment of the current and proposed waste activities against the Best Available Techniques (BAT) described in the BAT Guidance Notes for the Waste Sector. • Waste Transfer and Materials Recovery (EPA, 2011).*

An assessment of the current and proposed waste activities against BAT is in Attachment 5.

7. *Provide a screening for Appropriate Assessment in accordance with the document 'Appropriate Assessment of Plans and Projects in Ireland — Guidance for Planning Authorities', issued in 2009 by the Department of the Environment, Heritage and Local Government, and revised in 2010.*

A screening for Appropriate Assessment is in Attachment 6.

8. *Provide a waste storage plan for the facility which includes:*
 - *a drawing or plan of the location of each waste type and the means of storage for each waste type;*
 - *details of the drainage system superimposed on the above drawing or plan;*

- *confirmation of the maximum stockpile sizes in designated storage areas including maximum volume, height, length, width and area, and minimum separation distances;*
- *capacity of each storage area for the intended waste type;*
- *confirmation of the total quantity of waste to be stored at the facility at any one time; and*
- *confirmation that the plan has taken into considered a fire risk assessment.*

A waste storage plan is in Attachment 7. It includes a drawing showing the storage location of each waste type. The method of storage, size of the stockpiles and the total quantity of waste on site at any one time is described in the plan. The plan took into consideration the findings of a fire risk assessment.

9. *Provide a description of current and proposed waste activities inclusive of the following summary table (the first row is completed as an example and should be deleted to make way for real information):*

- *Ensure that each of the waste types (by List of Waste code) and the quantities sought for authorisation are represented in the above table.*
- *State the proposed overall annual waste acceptance threshold for the facility.*

Details of the types of waste including the LoW code and the quantities sought for authorisation are in Attachment 8. The overall annual waste acceptance threshold for the facility is 59,000 tonnes.

10. *Provide a description of current and proposed emissions to air, water and ground, including:*

- *the location and description of each emission point;*
- *the abatement systems in place prior to each emission;*
- *evidence that each abatement system is fit-for-purpose;*
- *an assessment of the current and predicted impacts of each emission; and*
- *identification of any authorised emissions that are proposed for decommissioning.*

A description of the current emissions to air, water and ground is provided in the Environmental Impact Assessment Report (EIAR) that has been submitted with the review application. The EIAR details the location of each emission point, the abatement systems that are in place and evidence that each system is fit for purpose. It presents an assessment of the current impacts of each emission. No new emissions are proposed.

11. *The ELP is minded to recommend that all activities and buildings used for the storage, holding and treatment of food, residual and other odour-forming waste should be under negative pressure with treatment of extracted air. To this end:*

- *specify which buildings at the facility would be subject to such a requirement;*
- *describe the measures that would be put in place and the air treatment technique proposed to be used; and*

- *provide an odour dispersion model in accordance with AG4' that demonstrates that there will be no nuisance odour caused at sensitive receptors as a result of any such point source emissions.*

The sole purpose of the provision of a negative pressure and air treatment system is to ensure that waste operations are not a cause of odour nuisance outside the facility boundary. The need for such systems is site specific, as is recognised by the EPA where the provision of such measures is not a mandatory condition in all licences issued to waste management activities.

KWD Recycling implements odour control measures which are described in detail in Chapters 4 and 10 of the EIAR. The effectiveness of these methods is demonstrated by the fact that KWD Recycling has not received any odour complaints from members of the general public in the past three years and that the OEE has never, over the course of many inspections in the same time period, raised concerns over the potential for odour issues at the facility.

KWD Recycling acknowledges that the EPA is obliged to take a precautionary approach to the proper control of nuisances associated with waste management facilities and accepts that odours from licensed activities are among the commonest cause of complaints. However the nuisance control measures must be site specific and proportionate.

In the absence of any evidence that a particular waste management facility is either a cause, or likely to be a cause of odour nuisance KWD Recycling considers a mandatory requirement to provide a continuous negative air pressure and air treatment system to be unnecessary. KWD Recycling considers that an alternative discretionary condition that requires the installation of such a system, unless otherwise agreed with the Agency, is appropriate for its facility.

12. *The ELP is minded to recommend that all other waste storage, holding and treatment activities are located indoors or under cover for the purposes of preventing dust emissions and contamination of rainwater. To this end:*

- *specify how this would be addressed and in particular identify any emission points to air arising from such buildings, such emission points being for the control of dust emissions; and*
- *provide an air dispersion model in accordance with AG4 that demonstrates that there will be no exceedance of air quality standards for dust or other relevant parameters.*

The only significant point source of dust emissions is the timber shredder which is located externally in the timber yard. KWD Recycling has stopped operating the shredder and intends to provide an enclosure around it. This may require planning permission. Dust control measures may be required for occupational health purposes, but the need for this has not yet been confirmed.

If an extraction and filter system is required an assessment will be carried out to determine the impacts of its operation and, in particular, to confirm the operation will not result in any exceedance of any ambient air quality standard.

The metal baler and shears is located externally in the metals yard. The unit is similar to those in use at metal recycling plants that operate under Waste Permits granted by the local authorities and Industrial Emission Licenses issued by the Agency, all of which have extensive external waste processing and storage areas. The baler/shears is not a source of dust emissions and there is no need in terms of environmental protection for it to be located either indoors, or under cover.

Surface water run-off from external areas where wastes are stored (metal yard, timber yard, yard to the south east of the main processing building and the bays beneath the C&D processing line) is collected and directed to three settlement tanks and a Class I Oil Interceptor which connects to the on-site constructed wetlands. These measures are consistent with those applied at other licensed facilities where the external storage of wastes is authorised and provide the required level of environmental protection.

13. *Provide a drawing or drawings showing the drainage arrangements at the facility. All sources, manholes, underground and over ground pipes, tanks, treatment systems and the emission point of treated effluent should be illustrated on the drawing.*
- *Describe the environmental receptor (groundwater and/or surface water) and illustrate it on the map. The environmental impact of effluent discharge should be evaluated.*
 - *If it is proposed that the discharge to ground is to be maintained, provide a hydrogeological assessment that demonstrates there will be no exceedance of groundwater quality standards and surface water quality standards to the extent that groundwater discharges to local surface water courses.*

Details of the drainage layout are shown on Drawing No. 3 in Attachment 9. A detailed assessment of the local hydrogeological conditions is in Chapter 8 of the EIAR, which describes the environmental receptors and assesses the impact of the discharge to ground of the treated surface water run-off from the on-site constructed wetland. It is proposed to continue to operate the constructed wetland.

14. *An area of deposit on the ground of construction and demolition waste was observed and it is apparent that the waste was used to infill an area of the facility behind the reed beds.*
- *State the nature and quantity of waste so deposited.*
 - *State why it is appropriate for this waste to remain in situ.*
 - *If it not appropriate for the waste to remain in situ, provide a remediation plan for the area to include the removal of deposited waste.*

The area referred to is an access road. It was formed using the outputs from the construction and demolition processing line and comprise concrete rubble, bricks and tiles that were typical of the output produced at the site. It is estimated that approximately 120 tonnes was placed to a maximum depth of 300mm.

The materials are suitable for use in the construction of the access road and replaced aggregates that would otherwise have to be sourced at an off-site quarry.

A conceptual site model (CSM) of the facility was prepared as part of a hydrogeological survey report, which has been submitted to the OEE. The schematic of the CSM is in Attachment 10. The site is underlain by a peat and low permeability till that range in thickness from 3 in the east to 5m in the west of the site, where the access road is located. Based on the type of the construction and demolition waste and the ground conditions their use does not present any discernible environmental risk and it is appropriate for the materials to remain in situ.

15. Adjacent to the area of the apparent deposit of construction and demolition waste, two stands of a knotweed invasive species were observed.

- *Provide an eradication plan for these plants. This plan should link to the remediation plan for the removal of construction and demolition waste to ensure that the removal of the latter does not result in the distribution of invasive species beyond the facility.*

KWD Recycling has retained a specialist invasive plant species contractor to eradicate the Japanese Knotweed. This will comprise a series of in-situ treatment over a period of three years. This approach has proven to be effective and eliminates the risk of distribution of the species beyond the facility.

16. Provide a report on monitoring of emissions at R1, R2 and SW1 that describes the monitoring carried out in accordance with the licence. The report should cover the periods 2015, 2016 and 2017 to date.

Present the monitoring results for all parameters listed in Schedule C.2.3. The following is a proposed format for the presentation of results, aggregated monthly.

The results of the monitoring carried out at R1, R2 in 2015, 2016 and 2017 are presented in Tables 8.11 to 8.17 in Section 8.6.1 of the EIAR. As the monitoring is only carried out annually the individual results are included. The results (averaged) of the monitoring of the discharge from the constructed reed beds in 2015, 2016 and 2017 are in Table 8.17 in Section 8.6.2 of the EIAR.

17. Provide a report on monitoring of waste process effluent that is removed from the facility. The report should cover the periods 2015, 2016 and 2017.

Present the monitoring results for all parameters listed in Schedule C.4. The following is a proposed format for the presentation of results.

The results of the monitoring of the process effluent removed from the site in 2015 are in Attachment 11. The results of the monitoring completed in 2016 cannot be located and the laboratory report on the testing carried out in 2017 was not available at the time this response was being prepared.

18. Provide confirmation of the thermal rated input of the generator used to power the wood shredder and the fuel type it utilises.

The generator is diesel fuelled and the thermal rated input is 520kva. There is a second generator, which serves as an emergency back-up for the site office. This is also diesel fuelled and the thermal rated input is 120 kva.

19. *Taking into consideration the numbers and types of non-compliances recorded for the facility in 2016:*

- *provide a description of the training programme provided for all personnel who work at the facility to ensure awareness of the relevant conditions of the licence to prevent exceedance of any licenced condition; and*
- *provide a description of a programme for the self-auditing of the facility to ensure compliance with the conditions of the licence and the Environmental Management System.*

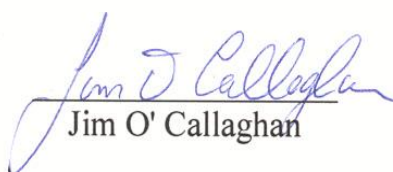
KWD Recycling has initiated a training programme for all site operatives that is delivered by the Facility Manager and Deputy Manager. The programme addresses all operational practices relevant to their role that have the potential to give rise to non-compliances, including waste handling, processing and storage; surface water management and nuisance controls. Staff are made aware that compliance with the licence conditions is crucial and that the Facility Manager and Deputy Manager must be immediately informed of any incident that could give rise to a non-compliance or 'near miss'.

The Facility Manager and Deputy Manager carry out regular site inspections to assess operations and identify potential compliance vulnerabilities.

20. *Provide an updated non-technical summary to reflect the information provided in your reply.*

An updated Non-Technical Summary is in Attachment 12.

Yours Sincerely,


Jim O' Callaghan