



Surrender Memo

DATE:	31 st January 2018
TO:	Gerard O'Leary, OEE Director <i>Approved</i>
FROM:	Pamela McDonnell <i>[Signature]</i>
SUBJECT:	Application for Surrender of Waste Licence Reg. No W0150-01, Clare County Council, Scarriff Civic Amenity Centre

1. RECOMMENDATION

I consider that the site of the activity is not causing or likely to cause environmental pollution and the site of the activity is in a satisfactory state and **the application to surrender the licence should be accepted** under Section 48[7] of the Waste Management Act 1996 as amended.

2. SUMMARY

Name of Licensee	Clare County Council
Licence Registration Number	W0150-01
Facility Address	Scarriff Civic Amenity Centre, Fossa Beg, Feakle Road, Scarriff, Co. Clare
Classes of Activity	Third Schedule of the Waste Management Act: Class 12 and Class 13 Fourth Schedule of the Waste Management Act: Class 2, Class 3, Class 4 and Class 13.
Date Licence Issued	20 th May 2002
Date Activity Stopped ¹ /Relevant Date	31 st March 2008
Date of Receipt of Application to Surrender	24 th August 2015
Persons consulted under Section 48(5)	None

¹ Or dropped below threshold

3. CLASSES OF ACTIVITY & DESCRIPTION

The classes of activity under the Waste Management Act 1996 as amended which apply to Waste Licence W0150-01 are:

Third Schedule

- **Class 12** -Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule:

This activity is limited to the compaction of waste and its transfer from the compactor unit to an enclosed container for storage prior to removal off-site to landfill.

- **Class 13** -Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, temporary storage, pending collection, on the premises where the waste concerned was produced:

This activity is limited to the storage of non-recoverable waste received at this facility, prior to disposal at an appropriate facility

Fourth Schedule

- **Class 2** - Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes):

This activity is limited to the acceptance of waste oils and cooking oils at the facility.

- **Class 3** - Recycling or reclamation of metals and metal compounds:

This activity is limited to the acceptance of beverage cans, white goods and other metals at the facility

- **Class 4** - Recycling or reclamation of other inorganic materials:

This activity covers the acceptance of glass at the facility.

- **Class 13** - Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced:

This activity is limited to the storage of waste types authorised by the licence at the facility prior to recovery at an alternative appropriate facility.

4. FACILITY LOCATION

This activity is located on a half hectare site at Fossa Beg, Feakle Road, Scarriff, Co. Clare, on the western boundary of Scarriff village. The facility is located close to Finsa Forest Products (Licence Reg no. P0022-01)



Figure 1: Location of Scarriff Civic Amenity Centre (W0150-01). Site boundary outlined in red.

5. FACILITY HISTORY

The installation was granted a Waste licence on 10th May 2002 to carry out certain waste activities as listed in the Third and Fourth Schedules of the Waste Management Act 1996 as amended (see section 3 above). This licence has not been amended or reviewed since it was granted.

The site comprises infrastructure for the recovery and transfer of mixed municipal waste and recyclables, and has not changed to any notable extent since the licence was granted. There is a foul water treatment plant for the treatment of foul water and sewage arising on site. Storm water discharges to the adjacent Scarriff stream.

The licence includes a total waste acceptance limit of 1000 tonnes. The general trend of waste acceptance at the facility was one of <1,000 tonnes per annum since 2011. Between 2008 and 2016, the maximum quantity of waste accepted in any one year was 1,457.11 tonnes (2008).

The Third Schedule (Part II) of the Waste Management (Facility Permit and Registration) Regulations 2007 (SI 821 of 2007), which commenced on the 31st March 2008, stipulates that the reception and temporary storage of waste (deposited by the public) at a central collection point, where the maximum quantity of waste stored at any one time is <1,000 tonnes, requires authorisation in the form of a Certificate of Registration. Scarriff Civic Amenity Centre held less than 1,000 tonnes of waste on site at any one time since the date the Regulations commenced. Therefore, it is considered that the activity should be authorised by a Certificate of Registration instead of a Waste licence. This issue is discussed further in section 7 below.

The main environmental issues at the facility since the licence was granted relate to waste storage and materials management. There are no air emissions of environmental significance.

There were no groundwater monitoring requirements set out in the licence. Bar evidence of oil staining outside an oil bund, noted during a 2006 site visit, there were no reported spillages or incidents which would potentially have had an impact on soil or groundwater quality.

6. COMPLIANCE HISTORY

Historically, compliance issues related to littering, documentation, waste storage, odour, labelling and bunding. During the exit audit, the inspector noted that an oil separator and silt trap had not been installed as required by the licence. This issue was noted in most of the previous site visit reports pertaining to the site.

7. CURRENT STATUS

As outlined in section 5 above, the waste acceptance trends at the facility indicate that it is operating at levels which would be more appropriately authorised by a Certificate of Registration as opposed to a waste licence.

The licensee applied to the EPA for a Certificate of Registration on the 30th October 2015. This application is currently under assessment. In accordance with Article 11(5)(d) of the Waste Management (Facility Permit and Registration) Regulations 2007 as amended, an activity the subject of a waste licence which has been determined by the Agency to now require a waste facility permit or a certificate of registration shall remain in force until such time as the waste licence is revoked or surrendered. Therefore, the licensee has applied to the EPA to surrender waste licence W0150-01.

An independent closure audit was arranged by the licensee, and the EPA confirmed during a subsequent exit audit that the only outstanding environmental issues remaining at the facility include the following:

- An oil separator/silt trap had not been installed on site in accordance with licence requirements. This issue was raised numerous times in previous site visit reports. The licensee has since confirmed that an oil interceptor is now installed.
- Kerbing was missing around a concrete pad in the yard area which was creating a pathway for storm water run-off to discharge to ground. Sampling of the soil at the overspill points from the concrete pad identified the presence of some extractible petroleum hydrocarbons in the upper layer of soil but did not identify any significant impact on soil quality. The licensee has since confirmed that the kerbing has been replaced.
- The tonnage data provided in the AERs from 2013 to 2016 were incorrect. The licensee has since clarified and corrected the tonnage figures.

Overall the Exit Audit found that the waste activity was no longer licensable, that the facility was run in a satisfactory manner, that no issues or evidence of pollution/contamination was noted and that there were no long-term environmental liabilities associated with the operation of the facility.

8. DETAILS OF LICENCE SURRENDER PROCESS

The licensee commenced an Independent Closure Audit in	<i>December 2015</i>
The final Independent Closure Audit Report was received on	<i>8th March 2016</i>
The main issues arising from the Independent Closure Audit were: <i>Improved record keeping needed. By-pass interceptor that meets EN 858 to be installed on the surface water drainage system. Scheduled desludging of the septic tank system to be completed. Repair of kerbing in yard areas. Dust monitoring should occur between May and September as required by the licence.</i>	
Regarding Consultation as per S.48(5):	<i>No consultation was carried out with Clare Co Co as they are the licensee.</i>
Known contamination:	<i>None.</i>
Remediation:	<i>None.</i>
Other Environmental Liabilities:	<i>None.</i>
Financial Provisions dealt with:	<i>No outstanding fees (see section 10 below).</i>

9. AGENCY ASSESSMENT

The Agency conducted an Exit Audit on:	<i>20th November 2017</i>
The Exit Audit Report was issued on:	<i>5th October 2017</i>
The main finding of the Exit Audit was: <i>The facility is operating below licensable thresholds and should more correctly be authorised by a Certificate of Registration. There are no long-term environmental liabilities associated with the operation of the facility.</i>	

10. SURRENDER FEE, FINANCIAL CHARGES & ACCOUNTS

A surrender fee was received in September 2015.

Liaison with Accounts has confirmed that Clare County Council have no outstanding fees.

Signed: *Pamela McDonnell*
Pamela McDonnell
Inspector OEE

Dated: 31st January 2018

Reviewed: *Mary Gurrie*
Mary Gurrie
Programme Manager, OEE

Dated: 31st January 2018

