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25th October 2017

Reg. No. W0217-02

RE: Notice in accordance with Article 16(1) of the Waste Management (Licensing) Regulations 2004, as amended.

Dear Conor,

I am to refer to the above referenced application for a review of a waste licence in respect of Killarney Waste Disposal Unlimited Company at Aghacurreen, Killarney, County Kerry. This notice is given under Article 16(1) of the Regulations, to enable the Agency to decide on the application.

The current licence review application was submitted in July 2010. Further information is required which reflects the current status of the facility and the proposed changes to the licence to allow for an assessment of this application in accordance with sub-articles 12(1)(a) to (v) of the Waste Management (Licensing) Regulations 2004, as amended.

The following information is required:

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.
2. Provide updated drawings showing the current and future (proposed) layout of the facility.
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.
4. Provide the information required in the tables and complete the tables at the following link:
<http://www.epa.ie/pubs/forms/lic/applicationtemplates/>
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).

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).
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. This document is available at:

http://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf

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.
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):

Waste intake type	Waste treatment process	Quantity proposed for acceptance (t/a)	Maximum capacity of the treatment process (t/d & t/a)	Output from the treatment process	Dispatch destination of the waste output	End destination process, including whether recovery or disposal
Municipal Waste (20 03 01)	Sorting line inclusive of trommel, ...		20t/d 6,080t/a	RDF	Name of facility at destination	Incineration, Recovery

- 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.
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.
 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 AG4¹ that demonstrates that there will be no nuisance odour caused at sensitive receptors as a result of any such point source emissions.
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.
13. Provide a drawing or drawings showing the drainage arrangements at the facility. All sources, manholes, underground and overground 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.
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.
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.
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.

Month (2015 – 2017)	Parameter and unit	Maximum value recorded during the period	Minimum value recorded during the period	Average value during the period	Averaging method used	Ambient Standard
Jan. 2015	Chloride (mg/l)					
Jan. 2015	Ammonia (mg/l)					

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.

¹ *Air Dispersion Modelling from Industrial Installations Guidance Note (AG4)* (EPA, 2010).

Month (2015 – 2017)	Parameter and unit	Maximum value recorded during the period	Minimum value recorded during the period	Average value during the period	Averaging method used
2015	Chloride (mg/l)				
2015	Ammonia (mg/l)				

18. Provide confirmation of the thermal rated input of the generator used to power the wood shredder and the fuel type it utilises.
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.
20. Provide an updated non-technical summary to reflect the information provided in your reply.

Please supply the information in the form of a one signed original and one copy in hardcopy format, and two copies of all files in electronic searchable PDF format on CD-ROM within **8 weeks** of the date of this notice. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is Reg. No. W0217-02. Please direct all correspondence in relation to this matter to *Ms Noeleen Keavey, Environmental Licensing Unit, Office of Environmental Sustainability, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,

Caroline Murphy
Inspector
Environmental Licensing Programme
Office of Environmental Sustainability