

 <p>epa Environmental Protection Agency <i>An Ghníomhaireacht um Chaomhnú Comhshaoil</i></p>	OFFICE OF ENVIRONMENTAL SUSTAINABILITY
ENVIRONMENTAL LICENSING PROGRAMME	
TO:	Dr Eimear Cotter, Director
FROM:	Michelle Reddy, Inspector, Environmental Licensing Programme
DATE:	22 August 2019
RE:	Technical Amendment to Industrial Emissions Licence Register Number: W0194-02, held by Advanced Environmental Solutions (Ireland) Limited, Kyletalesha Waste Transfer Facility, Kyletalesha & Kyleclonhobert, Portlaoise, County Laois.

The Agency received a request on 13th June 2018 from Advanced Environmental Solutions (Ireland) Limited, Licence Reg. No. W0194-02 to technically amend their Licence. The request relates to removing the requirement for a wheelwash as per Condition 3.9 of Licence Reg. No. W0194-02.

1. Background

Advanced Environmental Solutions (Ireland) Limited was granted a licence (Reg No W0194-01) on 9th February 2005 for an installation located at Kyletalesha Waste Transfer Facility, Kyletalesha & Kyleclonhobert, Portlaoise, County Laois. A revised licence (Licence Reg No: W0194-02) was issued to Advanced Environmental Solutions (Ireland) Limited on 30th March 2007. A technical amendment was issued by the Agency on the 16th December 2015 giving effect to the requirements of the Industrial Emissions Directive (Directive 2010/75/EU). The licence was amended on 29th June 2016, (Technical Amendment A) to include Fire Risk Assessment and Waste Storage Plan conditions.

The installation is licensed under Classes 11.4 and 11.1 of the First Schedule to the EPA Act, 1992, as amended. The installation is licensed to accept 99,000 tonnes per annum (tpa) of waste, consisting of household waste, commercial waste, industrial waste, construction & demolition waste, hazardous waste (WEEE), sewage sludges and non-hazardous industrial sludges.

2. Technical Amendment request

On the 13th June 2018, the Agency received a request for a Technical Amendment of IE licence W0194-02, in order to allow for the removal of the requirement for a wheelwash as per Condition 3.9 of the licence. The licensee contends the requirement for this condition, which was included in the revised licence (W0194-02), was necessary for on site composting of organic waste and sludge. It is noted that these activities never commenced at the facility.

3. Consultation with the Office of Environmental Enforcement (OEE)

I have consulted with the OEE team, in relation to this technical amendment request. The OEE confirmed that the proposed amendment cannot be accommodated under the existing licence. Due to the nature of the waste entering and leaving the facility the OEE advised that the condition in relation to the wheel cleaner should not be removed from the licence. OEE have confirmed that there are no legal proceedings in train in respect of this licence.

There have been two non-compliances issued to the licensee in relation to the absence of wheel cleaning facilities at the site on 16th September 2015 and 21st February 2017 respectively. This is in non-compliance with Condition 3.9 of Licence Reg. No. W0194-02.

4. Assessment

The Waste Transfer and Recycling Facility is permitted to accept 99,000 tonnes per annum consisting of household waste, commercial waste, industrial waste, construction & demolitions waste, hazardous waste (WEEE), sewage sludges and non-hazardous industrial sludges. Household, commercial and industry streams provide for the majority of material entering the site.

BAT Guidance Notes for the Waste Sector: Waste Transfer and Materials Recovery recommend the provision of wheel cleaning facilities. The wheel cleaning requirements in Condition 3.9 require all vehicles leaving the facility to ensure that no process water or waste is carried off-site. Due to the nature of material entering and leaving the facility there is sufficient reason to warrant a wheelwash on site.

Condition 3.9 requires access to appropriate wheel cleaning at the facility and does not require the construction of a wheel cleaning infrastructure. The licensee raised concerns that the installation of a wheelwash would significantly curtail safe vehicle turning circles in the yard.

5. Recommendation

I recommend that the requested amendment to remove the requirement for a wheel wash be refused due to the nature of material entering and leaving the facility there is sufficient reason to warrant a wheel wash on site.

Signed,



Michelle Reddy
Inspector
Environmental Licensing Programme