

 <p>Environmental Protection Agency An Ghníomhaireacht um Chaomhnú Comhshaoil</p>	OFFICE OF ENVIRONMENTAL SUSTAINABILITY
ENVIRONMENTAL LICENSING PROGRAMME	
TO:	Tom Ryan, Director
FROM:	Róisín Griffin, Inspector, Environmental Licensing Programme
DATE:	11 June 2021
RE:	Technical Amendment to Industrial Emissions Licence Register Number: W0257-01, held by Countryclean Recycling Limited, Churchfield Industrial Estate, John F. Connolly Road, County Cork.

The Agency received a request on 07/11/2019 from Country Clean Recycling Limited Licence Reg. No. W0257-01 to technically amend their Licence. The request is to amend a condition to remove the word 'building' from the term '*waste transfer station building*'. This would allow the licensee to store unprocessed timber outside buildings, within the licenced site boundary.

The Agency received an earlier separate request on 23/07/2019 from the licensee to technically amend their licence. The request relates to a change in the site boundary to facilitate an increased ease of movement for vehicles within the site.

This memo assesses both requests and recommends that the changes may be accommodated by a Technical Amendment, in accordance with Section 96(1)(c) of Environmental Protection Agency Act 1992 as amended.

1. Background

Country Clean Recycling Limited was granted a waste licence; Reg. No. W0257-01, on 30/01/2014 for a facility located at Churchfield Industrial Estate, John F. Connolly Road, County Cork, operating as a non-hazardous materials recovery facility.

The licence was amended on 29/6/2015 to incorporate the fire risk assessment and waste storage plan conditions following the publication of the EPA Guidance document "Guidance on Fire Safety at Non-hazardous Waste Transfer Stations". The licence was also amended for the purposes of Section 82A(11) of the EPA Act 1992 as amended, on 27/11/2015. This amendment gives effect to the requirements of Directive 2010/75/EU (Industrial Emissions Directive). The installation is licenced under Class 11.4 (b)(ii) of the First Schedule to the EPA Act 1992 as amended.

Mixed municipal waste from the domestic and commercial sector are accepted at the installation. Mixed dry recyclables, scrap metal, construction and demolition (C&D) waste, wood, bio-waste and textiles are also accepted.

2. Technical Amendment request

On the 23/07/2020, the Agency received a request for a Technical Amendment of IE Licence Reg. No. W0257, in order to allow for storage of unprocessed timber outdoors, within the licenced boundary. The licensee proposes the removal of the word 'building' from the below Condition 3.25.2 under Infrastructure & Operation:

3.25 Timber Shredding and Storage

3.25.1 Within twelve months of the date of grant of this licence, the timber shredder and timber shredding area shall be enclosed to contain and restrict dust and noise emissions.

*3.25.2 Within twelve months of the date of grant of this licence, stockpiles of timber and shredded material shall be contained within designated areas of the waste transfer **building** to minimise dust generation.*

The further separate request for technical amendment received on 07/11/2019 is to increase the licence boundary to facilitate an increased ease of movement for vehicles within the site.

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

I have consulted with the OEE Inspector Sinéad Doyle in relation to both of these technical amendment requests. The OEE confirmed that the proposed requests cannot be accommodated under the existing licence. OEE has confirmed that there are no legal proceedings in train in respect of this licence.

4. Assessment

Technical amendment request to remove the word 'building' from Condition 3.25.2

The timber shredding operation and storage of unprocessed and shredded material currently takes place within buildings. The Inspector's Report dated 26th June 2013 states the main sources of dust from the installation are likely to be from the waste transfer building where dust emissions may arise from C&D waste sorting, waste off-loading, baling and the proposed processing of mixed municipal waste. The report also refers to the enclosure of the timber shredding operation as a noise and dust attenuation measure.

Condition 8.1 of the licence explicitly states:

Unless otherwise agreed by the Agency, all waste processing shall be carried out inside the waste transfer building, with the exception of wood shredding which shall be carried out as stated in Condition 3.25.1. All wastes/materials shall be stored within the waste transfer building with the exception of metal, glass and other wastes which may, if agreed by the Agency, be stored in designated bays outdoors.

Condition 3.25.1 requires the timber shredder and the timber shredding area to be enclosed, while condition 3.35.2 requires stockpiles of timber and shredded materials to be contained within designated areas of the waste transfer building. The intention of condition 3.25.2 is clearly to address any potential dust nuisance. Dust nuisance is not likely to occur from the storage of unprocessed timber and as such, it may be appropriate to provide for outdoor storage of unprocessed timber. This can be facilitated by an amendment to condition 3.25.2 to remove references to 'stockpiles of timber' and include specific reference to processed

timber. It is also recommended to remove the timeframe specified in conditions 3.25.1 and 3.25.2 in order to reflect the up to date position.

This provides for unprocessed timber, a relatively low source of dust generation to be subject to the general dust, nuisance control, and waste storage conditions of the licence and facilitates the Office of Environmental Enforcement to consider approval requests to store unprocessed timber outdoors, in accordance with the provisions of condition 8.1.

The shredding operation and storage of shredded material would remain required to occur within waste transfer buildings.

Technical amendment request to amend the boundary of the site

The licensee has made this request to increase the red line boundary at the north of the site to the rear of the installation to facilitate an increased ease of movement for vehicles within the site. There are no proposed new entryways from the roadway. In addition to the current planning permission granted by Cork County Council 09/33682 in March 2010, the licensee received further planning permission in June 2013 (13/04463) for the proposed area of land, to be included within the amended licence boundary. This permission refers to the construction of a retaining wall, boundary wall, and storage bays for materials. The licensee owns the area of land requested in the technical amendment.

The increased area proposed in the request is directly adjoining the current site and the surrounding lands are of a similar nature to the current licensed area. The licence currently requires annual noise monitoring. The amendment to the boundary provides for improvement to the overall operation of the site and the request can be accommodated under a technical amendment.

5. Appropriate Assessment

Appendix 2 lists the European Sites assessed, their associated qualifying interests and conservation objectives.

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activity, individually or in combination with other plans or projects is likely to have a significant effect on any European Site. In this context, particular attention was paid to the European Sites at Cork Harbour SPA (004030) and Great Island Channel SAC (001058).

The activity is not directly connected with or necessary to the management of any European Site and the Agency considered, for the reasons set out below, that it can be excluded, on the basis of objective information, that the activity, individually or in combination with other plans or projects, will have a significant effect on any European Site and accordingly determined that an Appropriate Assessment of the activity was not required. This determination is based on the fact that the proposed amendments will not result in an increase in emissions from the activity.

6. Recommendation

This memo recommends that the requested changes be accommodated by a Technical Amendment of Licence W0257-01 (held by Country Clean Recycling Limited), in accordance with Section 96(1) (c) of the EPA Act 1992 as amended.

I recommend that the licence amendment be approved as set out in the attached recommended Technical Amendment. The making of the amendment will not result in the relevant requirements of Section 83(5) of the EPA Act 1992 as amended, ceasing to be satisfied.

Signed,

A handwritten signature in cursive script, appearing to read "Pádraig Griffin".

Inspector
Environmental Licensing Programme

Appendix 1: List of European Sites assessed, their associated qualifying interests and conservation objectives.

	European Site (site code)	Distance/ Direction from installation	Qualifying interests (* denotes a priority habitat)	Conservation objectives
1	Cork Harbour SPA (004030)	6 km southeast of the installation	Species A004 Little Grebe <i>Tachybaptus ruficollis</i> A005 Great Crested Grebe <i>Podiceps cristatus</i> A017 Cormorant <i>Phalacrocorax carbo</i> A028 Grey Heron <i>Ardea cinerea</i> A048 Shelduck <i>Tadorna tadorna</i> A050 Wigeon <i>Anas penelope</i> A052 Teal <i>Anas crecca</i> A054 Pintail <i>Anas acuta</i> A056 Shoveler <i>Anas clypeata</i> A069 Red-breasted Merganser <i>Mergus serrator</i> A130 Oystercatcher <i>Haematopus ostralegus</i> A140 Golden Plover <i>Pluvialis apricaria</i> A141 Grey Plover <i>Pluvialis squatarola</i> A142 Lapwing <i>Vanellus vanellus</i> A149 Dunlin <i>Calidris alpina alpina</i> A156 Black-tailed Godwit <i>Limosa limosa</i> A157 Bar-tailed Godwit <i>Limosa lapponica</i> A160 Curlew <i>Numenius arquata</i> A162 Redshank <i>Tringa totanus</i> A179 Black-headed Gull <i>Chroicocephalus ridibundus</i> A182 Common Gull <i>Larus canus</i> A183 Lesser Black-backed Gull <i>Larus fuscus</i> A193 Common Tern <i>Sterna hirundo</i> A999 Wetlands	As per NPWS (2014) Conservation objectives for Cork Harbour SPA (004030) Generic Version 1.0. Department of Arts, Heritage and the Gaeltacht (dated 16/12/2014).

2	Great Island Channel SAC (001058).	11 km south east/southeast of the installation	Habitats: [1140] Mudflats and sandflats not covered by seawater at low tide [1330] Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>)	As per NPWS (2014) Conservation objectives for Great Island Channel SAC (001058) Generic Version 1.0. Department of Arts, Heritage and the Gaeltacht (dated 16/06/2014).
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