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PO Box 3000,
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13th October, 2008

Re: Municipal Solid Waste – Pre-treatment & Residuals Management

An EPA Technical Guidance Document

Consultation Draft

Dear Dr. Derham,

I refer to the above EPA Technical Guidance Document, a consultation draft of which has recently been issued by you for public comment.

1. Background

For waste management purposes the South East Region consists of Carlow, Kilkenny, South Tipperary, Waterford and Wexford County Councils and Waterford City Council. South Tipperary County Council has been acting since 2001 as the lead authority on behalf of these 6 local authorities. The first Joint Waste Management Plan was made by the 6 authorities in 2002 and was revised in 2006.

South Tipperary County Council, as lead authority, wishes to offer the following comments and submissions in respect of the above document on behalf of the 6 authorities in the South East Region.

The major challenge facing the 6 local authorities in the South East Region is to ensure that the management of waste within the Region meets European, National and Regional waste recycling and recovery targets. With this in mind the Region proposes to procure integrated waste management infrastructure by way of a public private partnership.

The infrastructure will include existing materials recovery and biowaste treatment facilities, the provision of waste transfer stations and the construction of an energy from waste facility.

2. Overview

Sustainable development calls for an environmentally sound, cost effective and socially acceptable management of municipal and industrial waste. The technology of pre-treatment of waste, in order to avoid any harmful effect on the environment, has to be examined together with waste quality, waste management conditions as well as other economic, ecological and social aspects. Pre-treatment of municipal solid waste can contribute to a rapid improvement of the waste management situation with respect to landfill gas production, leachate emissions and settlements.

Page 12 of the consultation document lists a number of processes which can constitute the pre-treatment of waste. There are issues for each of these technologies which should be taken into account. The main issues to consider are:

- the operational status of each technology type – will it be able to process the required amount of waste;
- a market for the products – if sufficient market capacity cannot be identified, material would need to be landfilled which would increase the overall cost and probably result in failure to meet the Landfill Directive targets;
- emissions from the treatment process;
- public perception of the technology, incorporating planning permission requirements, traffic implications, and visual impact; and
- cost implications for the process, both capital and operational.

Reducing the volume of waste which is landfilled, however this is to be achieved, will require active public support:

- public support for, and participation in, action to reduce waste arisings and to increase recycling will be required in the short, medium and long term in order to minimise the potential landfill generated;
- the public are likely to be suspicious of some new treatment systems and must therefore be educated on the environmental realities surrounding waste treatment in order to generate support; and
- any new pre-treatment waste plant is likely to be an industrial scale development necessitating a revision of an existing waste licence. Public

opposition to a review of a waste licence may be greater if there are uncertainties or misconceptions about the plant and the environmental impacts it might have.

To be effective in reducing the volume of waste committed to landfill, as well as actively promoting and facilitating waste reduction, recycling and composting, it will be necessary to embark on some form of pre-treatment. Such pre-treatment is designed to maximise the amount of waste which can be re-used either as dry recyclables or compost and also to reduce the physical volume of the residual waste.

3. Page 13:

The last paragraph on page 12, continuing to the top of page 13, refers to the provision of integrated waste treatment operations, particularly in urban areas where collected waste is brought to purpose built factory units with modular waste treatment processes combining all or combinations of manual, mechanical and biological treatments. The document goes on to state that such operations previously referred to as Materials Recovery Facilities, are now often identified as mechanical biological treatment (MBT) facilities.

The distinction between Materials Recovery Facility (MRF) and mechanical biological treatment (MBT) should be highlighted as it is confusing to identify these facilities as being similar in nature.

4. Page 15:

The second paragraph on page 15 states that, in order to meet the pre-treatment and bio-waste diversion obligations set out in the Landfill Directive and having regard to the principles of BAT, a landfill operator must be able to demonstrate to the EPA that the level of pre-treatment (incl. diversion) of the waste accepted at the facility is sufficient to ensure compliance with the required diversion obligations. However, the waste collectors may not support the facilities which go to the expense of providing same. It is reasonable to expect that the waste will need to be directed to those facilities which provide the higher recover technology. This could be achieved through a "quota system" to be administered through the Waste Collection Permits.

5. Page 17:

Paragraph 2 on page 17 seems to indicate that pre-incineration biological treatment of residual waste is not mandatory and would be decided on a case-by-case basis having regard to the environmental and economic efficiency of the proposal. Here again the waste would need to be directed to the facilities with the higher recovery technology.

6. Economies of Scale:

It is noted that the examination process of existing waste licences, following finalisation of this technical guidance document will extend to the 29 operational MSW landfill sites

in Ireland with a further 6 with licences but which have not yet commenced operations. Pre-treatment of waste for landfills with relatively small tonnages may be less efficient, based on economies of scale, than some of the larger landfill sites with high tonnages. The cost implications of such pre-treatment requirements must be carefully considered.

7. Consistency of Terms:

It is suggested that greater clarity in the use of terms in the document is required in the interest of consistency. Examples are:

- (a) “waste incineration” : page 2
- “waste to energy (incineration)” : page 3
- “thermal treatment”: pages 12 and 16
- “incineration” : page 14
- “incineration with energy recovery”: page 14
- “incineration paragraph”: page 17

- (b) “urban areas” : page 15

 “large urban areas” : page 16 (Figure 6)

A definition of an urban area, e.g. population threshold, needs to be stated.

8. Current Situation in South East Region:

The South East Region is of the view that the requirements for pre-treatment of waste can be currently satisfied by separation at source and by separate collections which are 2 of the processes listed as forming pre-treatment on page 12 of the document, viz.

- source separation (e.g. home composting, packaging waste)
- separate collections (e.g. “2 Bin” or “3 Bin” systems).

In the South East Region, the roll out of the 2-Bin collection service provides for the collection of residual and dry recyclable waste streams. All householders availing of a local authority collection service have access to a segregated waste collection service. The private sector has made substantial progress in the roll out of the 2-Bin collection service. All dry recyclable collection services provide for the collection of paper/cardboard, paper/cardboard packaging, plastics and metal containers. Dry recyclables are also collected using clear plastic bags, the benefit of which is in the identification of contamination.

The roll out of the 3-Bin collection service has already taken place in Waterford County and Waterford City and on a pilot basis in parts of Wexford County. The roll out will be extended to the remaining parts of the region in 2009 with the waste collection permits being used to require implementation of this policy by the private sector. The 3-Bin collection service for all urban areas, with a population of greater than 1,000 persons will collect:

- dry recyclables;
- organic waste; and
- residual waste.

Pay by weight and volume charging systems have been introduced, which is believed will encourage greater recovery rates.

Chapters 8 and 9 of the Joint Waste Management Plan for the South East Region 2006 set out details in relation to waste forecasts, waste arisings, future infrastructural capacity requirements and policy development. Taking cognisance of same, the Region is confident that it can satisfy the aspirations of the EPA in relation to municipal solid waste with respect to pre-treatment and residuals management in the short to medium term.

9. Conclusion

The South East Region welcomes the opportunity to comment on the consultation draft of this technical guidance document. However, the Operational Committee of the Joint Waste Management Plan for the South East Region 2006 will not have an opportunity to discuss the consultation draft until its next meeting on 17 October, 2008 which is subsequent to the closing date of 13 October, 2008 for the submission of comments on the draft.

The Operational Committee would very much welcome an opportunity to discuss the proposed technical document with you as I am sure that an exchange of views would be mutually beneficial and useful

I will be in touch with you shortly regarding the possibility of arranging such a meeting.

Yours sincerely

Denis Holland,
Senior Engineer,
Environment.