

MUNICIPAL SOLID WASTE - PRE TREATMENT AND RESIDUAL MANAGEMENT

EPA TECHNICAL GUIDANCE DOCUMENTS

RESPONSE TO CONSULTATION DRAFT

This response by Fingal County Council recognises the urgency and importance of meeting the EU Landfill Directive obligations with regard to diversion of biodegradable waste.

The essence of the proposal, with regard to landfills, is that "the operator of an existing landfill must demonstrate to the EPA that, by the 16th July 2009, all waste delivered to the landfill will have been adequately pre-treated (including diversion). "In the case of a landfill or WtE Incinerator Operator, the evidence required by the EPA regarding the appropriate level of pre-treatment of accepted waste will be based on a site / region specific assessment".

It seems somewhat unreasonable that landfill operators would have the obligation to ensure appropriate pre-treatment including 2 or 3 bin collection systems when they are not directly involved in the collection process. It would be more appropriate for the EPA and / or local authorities acting through Regional Waste Management Plans to determine what levels of pre-treatment should be applied to different waste streams. It should also be open to the EPA and / or local authorities to direct waste including residual waste to facilities which provide higher recovery potential in accordance with the EU Waste Hierarchy.

The minimum proposed pre-treatment for municipal solid waste is for a source separated 2-bin system plus further mechanical and biological treatment. Figure 5, however, indicates that even where the 3-bin system is in place further mechanical and biological treatment will also be required. The risk with this

approach is that the costs associated with providing a 3-bin system plus MBT will be prohibitive and collectors will opt for a 2-bin system with MBT which will be less environmentally beneficial than providing a 3-bin system without MBT. The guidance document should provide advice relating to the environmental benefits of a 3-bin rather than a 2-bin system which will strike a balance between costs and environmental benefits.

The proposal distinguishes between Urban and Rural areas on the requirement for pre-treatment of residual waste. While there may be a need to require less segregation of waste on rural and domestic collection routes because of the energy use and cost of collecting from sparsely populated areas, once the waste is collected and brought to a waste facility there is no basis for not requiring MBT treatment of rural derived waste as opposed to urban derived waste.

With regard to the requirement to extract recoverable recyclables from incinerator ashes, consideration should be given to dropping this requirement where there is a dry recyclable collection which will remove tins and cans. The quantity of metal that is likely to be recovered and the cost of treating the ash should be considered before requiring this additional treatment process.

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