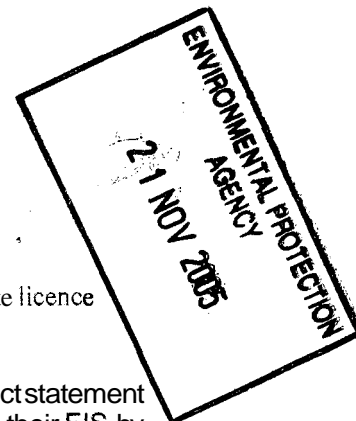


**RE: Application for Waste Licence Ref: 212/1**

I, Adam Green  
Of Killowen Orchard Portlaw Waterford



Wish for the following observations to be lodged with the EPA in relation to the waste licence application of the proposed development at Killowen, Portlaw, Co. Waterford

- 1) The developers, AES, have failed to supply an adequate Environmental Impact statement (EIS) despite being asked for further information by the EPA and a revision of their EIS by Waterford County Council.

A waste licence was applied for on 11<sup>th</sup> Nov 2004 but on 1<sup>st</sup> March 2005 they were issued with a notice requiring further information to be supplied by 26 April 05. As no information was received a reminder was issued on 12 May 05. Further info. Was finally received into the EPA on 29 July 05.

**Under the current guidelines, the EPA may void the application in an incidence where further information has not been received within a required timeframe as appears to be the case with this application.**

A licence to discharge trade effluents (ref WPW 03/2004) exists in the name of Bedminster international (Ireland) Ltd to discharge waste, none has been issued to the AES element of the business. In the interests of clarity the official applicant company should be referenced on all permits and documentation.

- 2) There was no public participation sought at any stage when attempting to prepare or revise the EIS by not doing so, this planning application is out of compliance with the Environmental Impact Assessment directive 85/337/EEC as amended by Directive 97/11/EC.
- 3) The information submitted is not in compliance with many aspects of the national and regional directives including: the Joint Waste Management Plan for the South East (JWPMSE), South-East waste management plan, Waterford Sludge Management Plan, Animal by-products (APB) regulations 1744/2002 and with the prohibition of swill order (SI 597 of 2000)
- 4) The community has serious concerns about the ability of this proposal to operate in an effective and environmentally safe way. In regard to the liquid waste project we are concerned about the importation of waste from outside the southeast region and the release of treated, or partially treated wastewater into the Suir. This will put further burden on the river.
- 5) Until the establishment of Michell Leather Ltd. this area of the river Suir was literally alive with an abundance of fish, otter and numerous protected flora and fauna now, however, according to the Department of the Environment, heritage and Local Government the river **"has a quality rating ("Q rating") of 3 this is not considered satisfactory for a salmonoid river..... Obviously any further loading on these waters would therefor not be acceptable..... The source of at least some at least: could be from outside the catchment of the river Suir. There is risk therefor that the operation of the treatment plant could therefor add to the pollution loading on the river Suir"**  
The Southern Regional Fisheries Board has also objected to the proposed development.
- 6) Despite AES insisting that the Bedminster technology has been **"tried and tested"** the fact remains that this technology has serious failings. The Bedminster facility in Cairns, Australia had to close within 3 months of opening to rectify problems encountered mainly due to odours, rusting componentry and lack of quality final compost. The closure lasted 10 months. This is not the only Bedminster facility to experience set-up problems: Numerous facilities in America have experienced similar problems, **Cobb County in Georgia** is the most worrying: during start-up phase odour complaints were lodged with authorities on a daily basis and in that same year the facility burned down - twice! The Cobb County authorities took over the running of the facility but have recently announced their intent to close the plant, as it is not economically viable. Fire also devastated facilities in Pennington County and Truman, Minnesota and many other facilities using bedminster technology, have been subject to ongoing odour complaints and difficulties finding markets for the finished compost.

Signed: \_\_\_\_\_

**RE: Proposed development, ref. Number: PD 04/1831**

In addition to my previous objection in regard to this planning application,

I, ..... *Adam Green* .....

Of ..... *Killowen Orchard Portlawn Co. Waterford* .....

Wish for my continued objection to the proposed development at Killowen, Portlawn, Co. Waterford to be noted paying particular notice to the following issues:

- 1) No significant local consultation has been carried out by the company at any stage of the planning procedure, save an initial verbal exchange with five households in the immediate area. At no time has the company attempted to hold a public information meeting or formal consultation process to inform the local communities of their proposed development.

I was directly affected by the previous facility and suffered primarily from odour, noise and traffic nuisances and light pollution.

As a result, I feel that AES should be obliged to hold a proper consultative forum with all concerned local residents prior to any further submissions to the County Council.

- 2) AES still has not provided an adequate EIS which is in accordance with Article 5 (3) of the European (EIA) Directive 97/11/EC.

AES was required to provide further information including a "revised EIS" on 26<sup>th</sup> January 2005 to be made available within six months of being issued with the requirement by Waterford County Council. As this information has not been submitted within that timeframe, I feel that the application should be deemed withdrawn. Planning regulations Article 33 subsection 4 specific to dealing with further information state:

*"Where a requirement under sub-article (1) is not complied with, the planning application shall be declared withdrawn after a period of 6 months from the date of the requirement for further information or evidence has elapsed"*

- 3) The proposed development is not fully in compliance with the Joint Waste Management Plan for the South-East region (JWMPSE). AES does not give an undertaking to source all of its' liquid streams (Wastewater) from within the South East region, instead it states "AES may at times source waste from outside the region depending on availability of waste streams and other market forces." Thus we are faced with the prospect of importing waste from outside the region, burdening our waterway which, given its Quality rating of 3, is particularly hazardous to the candidate Special Area of Conservation (cSAC) annex II in which it is situated.

- 4) AES intends to operate a dirty materials recovery facility in Killowen for an unspecified period of time until the waste can be separated at source in a three-bin collection system.

It is envisaged that the rolling out of a three-bin collection system will not be carried out until 2008. AES are proposing to operate outside of JWMPSE regulations in the interim. This facility should not be considered a viable venture until the three-bin system is in place throughout the region.

5) The final quality of the compost dictates its eventual market. As the nature, quantity and type of bio-solids entering the facility cannot be anticipated it is highly unlikely that grade "A" compost would be achieved. AES has failed to identify where it intends to sell or dispose of the processed material. It is unacceptable to rely on information suggesting this "third party company" (Landfeeds Ltd, owned by AES) will dispose of the compost without ascertaining where it will end up. There is no guarantee that reliable and stable markets will be available for this material.

No area been designated for the compost's storage and for the prevention of contamination to or the mixing of different grades of final compost This will be an issue particularly during the restricted winter months when the compost cannot be ploughed into land.

6)

civic 'amenitycentres' and their collection frequency would further assist in source

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I trust this and my previous submission will be taken into consideration when making a decision on the outcome of this application.

Yours Sincerely,