

Environmental
Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford

Environmental
Protection Agency
19 NOV 2008

Mr. Terry Kearns ,
Rathdrinagh,
Beauparc,
Navan
Co. Meath

17/11/08

Re: Objection to Proposed Decision - (W0140-03) for Review of W0140-02 ³

Dear Sir/ Madam,

Please accept this correspondence as an objection to the Proposed Decision of the Environmental Protection Agency to issue Nurnedale Ltd trading as Panda Waste Services Ltd, with a Review of their Waste Licence in respect of their facility at Rathdrinagh, Navan, Co. Meath. I would also officially request an Oral Hearing on the issue.

The decision to grant an increased throughput from 165,000 tonnes to 250,000 tonnes is totally unacceptable to us and many other local residents in the area who live in proximity to the Panda Waste Service Ltd facility. The operation is at present oversized having already increased the throughput capacity from 24,000 tonnes to a substantial 165,000 tonnes in a Waste Licence W0140-02 received in April 2005. The facility has expanded at rapid rate in a short few years and while one would not begrudge any company its success, we as local residents would have vehemently opposed the initial development had the extent to which it would affect the local social and environmental elements of the Rathdrinagh area been foreseen. The proposed decision to review the existing waste licence extending the physical footprint and operational capacity is pushing the boundaries of acceptability. The Panda Waste facility is already a development that is more suited to an industrial zone on the outskirts of a large urban centre, than in the quiet rural setting it has been imposed upon. An allowance in the tonnage increase will reflect in an increase of all current environmental and social nuisances to us and all residents who live in the immediacy of the facility.

The current operations at the Panda Waste facility constantly give rise to foul smelling odours which are quiet overpowering on occasion. These incidents have been notified to both Panda Waste management and to the Environmental Protection Agency by us and other affected local residents without any betterment of the situation. The putrid and foul smelling emissions are such that, as a result, one

cannot open windows or doors in our home or allow children outside. The increase in throughput tonnage for the Compostable Waste Type (which is the main source of these odours) from 15,000 tonnes per annum to 20,000 tonnes per annum is totally unacceptable to us as local residents living in close proximity downwind (from the prevailing direction) of the facility. Panda Waste has made no reasonable effort to ensure us that these nuisance emissions will be abated or ceased altogether in future. The bio-filter odour treatment unit that is currently in use at the site is totally inadequate and is merely a masking agent not a solution to the problem. We have been informed by Panda Waste Personnel that the bio-filter was constructed as a "home-made" project and was not designed or purchased as a specialised, proven odour treatment product. This does not fit the Best Available Technology model which is at the basis of much EPA documentation and as such the continued use of this existing bio-filter is unacceptable. We would urge that proven technology be employed at the site by Panda Waste to eliminate this nuisance which has caused much discomfort to us and other local residents and that the request for an increase in tonnage of 5,000 tonnes per annum is refused.

Schedule C.1.1 – Control and Monitoring of Emissions to Air provides for daily odour assessment of the bio-filter to be carried out by a designated employee of Panda Waste. This self-regulation is not acceptable to us as local residents. We would urge that assessments be carried out at least weekly by qualified independent observers and that the EPA would survey local residents on a number of occasions per year as to the effectiveness of the abatement plant. We would also request that the requirement for bi-annual assessment (using sampling tubes) under Schedule C.1.1 of pH, Ammonia and Mercaptans be increased to at least bi-monthly and that Hydrogen Sulphide be included in this analysis, in order that instances of foul odour emissions are captured.

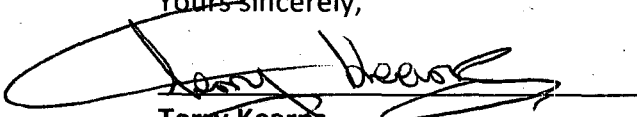
We respect the decision of the Environmental Protection Agency not to grant extended Operating Hours to the facility but would nevertheless advise that the existing hours of operation are consistently breached by the operator. Noise from the operating of waste handling and processing equipment can be heard emanating from the premises as late as 1am on numerous occasions. No noise monitoring investigations have been undertaken at these times. We would urge the EPA to direct Panda Waste Services Ltd (under Condition 3.4.2 Facility Security) to install extra CCTV cameras, with digital time-stamping, *throughout the facility* and that digital recordings from these be inspected regularly to ensure that licensed operational hours are not contravened. This is a simple operational control which is commonplace practise throughout Europe and would also ensure that the hours of acceptance of waste at the facility are also adhered to.

Dust emanating from the facility is a constant nuisance to us and other local residents. We would request that extra monitoring points be set up to measure dust deposition at sensitive locations in proximity to the facility including at residential dwellings downwind of the prevailing wind direction and that further abatement technologies be employed by Panda Waste on items of equipment giving rise to this type of nuisance emission.

In relation to the building of a Reed-bed / constructed wetland, we would object to this development on the grounds that it will give rise again to foul odour emissions, will be a breeding ground for vermin and flies and if not properly constructed or maintained will result in further pollution of the groundwater and surfacewaters in the area. The infrastructural requirements for a facility of this size and nature can only be provided in an urban industrial context where the volume of emissions expected would be directed to public foul and surface water sewer systems with appropriate treatment provided. The protection of both ground and surface waters is paramount and this cannot be guaranteed by the either existing or proposed treatment facilities at the Panda Waste site at Rathdrinagh. It is unacceptable that a point discharge at SW1 of soiled surface water from a waste handling facility is tolerated by the EPA. The Assimilative Capacity should be determined along with an assessment of the existing condition of the receiving stream by an independent body before continuing to allow emissions enter from the Panda site. We would urge that the frequency of monitoring as required under Schedule C.2.2 – Monitoring of Emissions to Water be greatly increased particularly in relation to BOD, COD, Ammonia, Sulphate, Metals and Oil, Fats and Greases to bi-monthly in the least. The volume of flow of the receiving stream should be monitored regularly as should water quality (by sampling and analysing both upstream and downstream of the emission point discharge).

We would respectfully request that this objection to proposed decision and request for oral hearing be given due treatment. Enclosed please find cheque for the appropriate fee in relation to; the objection and the request for an oral hearing.

Yours sincerely,


Terry Kearns

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