

Sub (3)

W0287-01

Environmental Protection Agency Licensing
Received
9 MAR 2013
Initials <i>[Signature]</i>

Submission re: waste licence application **W0287-01** for *[Signature]*

Ormonde Organics Limited, Ormonde Organics, Killowen, Portlaw, County Waterford.

Can you answer the following queries I have on behalf of a number of residents and others who live across the river opposite the site where the waste activity will be carried out?

1. What type of waste will be processed on this site under this licence?
2. Where will the waste be coming from?
3. How much activity daily will the process generate as far as transport is concerned, i.e. Lorries coming and going from the site?
4. What will be the average quantity of compost produced daily (i.e. 24hr period) in terms of metric tonnes (mt) from Shed 4?
5. Where will the compost be stored?
6. What is maximum storage capacity proposed for compost in terms of metric tonnes?
7. How many metric tonnes of Animal By-Product waste will be disposed, recycled or recovered per day (Le 24hr) by the proposed biological anaerobic digestion and composting processes?
8. How has the company demonstrated there is a need and viable market for quantities of compost proposed?
9. Where specifically will the compost be spread?
10. Please provide a Nitrogen Management Plan (NMP) outlining the specify locations where the compost will be land spread?
11. Will the compost have reached "End of Waste" status prior to been land spread? If so, please explain how.
12. What quality controls will be implemented to determine the compost is fit for purpose.
13. How often will testing be completed?
14. If any batch of compost fails quality control inspections or is otherwise deemed unacceptable (i.e. high micro or chemical content). Where exactly will the compost be disposed?
15. How much lechate and waste water will be produced from the process.
16. How far is the nearest residential property and/ or building where members of the public may enter when measured from the nearest

anaerobic digestion/ composting facility and boundary of the licence facility?

17. Based on international best practice and/or EPA standards, what setback distance does the EPA deem it is safe from emissions to locate an anaerobic digestion/composting biological treatment processes from the nearest residential home, local business, well, water course, Natura site, and building where members of the public may enter?
18. Based on international best practice, what setback distance does the EPA deem it is safe from emissions to locate a waste dryer from the nearest residential homes, local businesses or building where members of the public may enter?
19. In the past there was a strong odour coming across the river that was badly impacting residents in the area. This was dealt with a couple of years ago. How can we be sure there will not be a repeat of this? This I believe is a liquid composting process which gives off far stronger and greater odours than dry composting.
20. Will odours be coming from the plant? If so these need to be dealt with on site. Residents should not have to put up with this if it occurs.
21. Will there be an impact to salmon stocks on the river.
22. Is there a greater risk of fire and explosion from this process as I believe there will be a number of large tanks full of liquid or other combustible material? How will this be dealt with?
23. What happens the high energy produced with this process at this site?
24. What fuel will be used in the process?
25. Will any plastics that come with the material be removed before processing?
26. What will the height of any stack be?
27. What constitutes the fume and vapour coming off the process?
28. How will the ash be controlled and where will it be disposed of.
29. What is the maximum emission values from the CHP engines, Flare and Biomass furnace in terms of (PM 2.5, PM10), AOX, HCl, HF, NOx, SOx, CO, H2S, VOC, PAH, PCDD / F and R2SiO (Siloxanes)?
30. How and at what frequency will the above emissions be monitored?
31. What exhaust emissions will be monitored in real-time?
32. Will the results of the emission monitoring be made available to the public?
33. How may the public access the monitoring results?

34. Will the site operate 24/7
35. Will the site have employees on site 24/7?
36. Will the employees be trained to cope with emergencies, spills, fires etc?
37. How many extra employees will the new process require?
38. There has been no consultation with the many residents that live on the opposite bank of the river from Fiddown to Mooncoin. Why did this not happen as it could impact the area?
39. Can consultation with the public be done now?

I would be obliged if you can answer clearly the above questions in order for local residents to be satisfied and confident that there will be no impact to them or to the environment.

Looking forward to your reply.

Cllr. Pat Dunphy,  
Kilkenny County Council,  
Ballygorey,  
Mooncoin.

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