

APPLICATION TO REVIEW

WASTE LICENCE REG NO. 53-2

GREENSTAR LTD

FASSAROE, BRAY

CO. WICKLOW

(VOLUME 1 OF 2)

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Prepared For: -

greenstar Ltd.,
Fassaroe,
Bray,
Co. Wicklow.

Prepared By: -

O' Callaghan Moran & Associates,
Granary House,
Rutland Street,
Cork.

2nd September 2004



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INTRODUCTION

greenstar Ltd (*greenstar*) is applying to the Environmental Protection Agency (Agency) for a review of the Waste Licence for its Materials Recovery and Transfer Bray Depot at Fassaroe, County Wicklow (Reg. No. 53-2). The objectives of the review are: -

- To amend Condition 1.2 to reflect a proposed minor realignment of the facility boundary and the associated proposed transfer of ownership of a small portion of the current licensed area.
- To increase the overall limit set for annual waste inputs from the 129,500 tonnes specified in Schedule A of the licence to 200,000 tonnes and to increase the individual limits for the Household, Commercial and Construction and Demolition waste. It is not proposed to change the waste types accepted at the facility.
- To amend Condition 1.6 to allow the hours of operation to be amended with the Agency's agreement.
- To change the location of the composting facility from that specified in Condition 3.16.1.1.
- To amend the capping system specified in Condition 4.4.2.
- To amend Condition 5.1.1 to allow the external processing of Construction and Demolition waste to continue beyond April 2005.
- To increase the volume of waste composted at the site from the 2,000 tonnes specified in Condition 5.4.1.1 to 10,000 tonnes per annum.
- To amend Conditions 5.5.1 and 5.5.2 to allow permitted waste carriers and licensed/permitted disposal/recovery facilities to be used without the Agency's prior agreement.

The format of the application is based on the requirements of Parts II and III of the Waste Management (Licensing) Regulations 2004 (2004 Regulations) and in particular Articles 5, 6, 7, 9, 12 and 13 of the Regulations.

All Drawings referenced in the Waste Licence Application are located in Volume 2 of 2 Drawings, which accompanies the application.

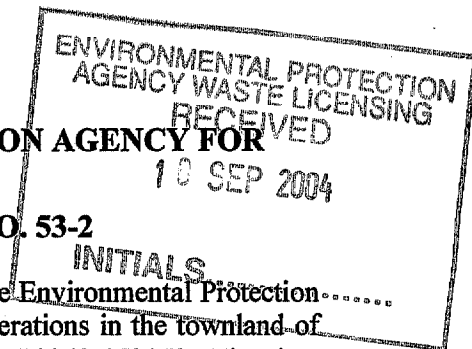
1. ARTICLE 5, 6, 7 & 9

A copy of the notice published in a newspaper circulating in the area, a copy of the site notice and the written notice submitted to the planning authority are included overleaf.

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APPLICATION TO THE ENVIRONMENTAL PROTECTION AGENCY FOR

THE REVIEW OF WASTE LICENCE REG. NO. 53-2



greenstar Ltd., Bray Depot, Fassaroe, Bray, Co. Wicklow is applying to the Environmental Protection Agency for a review of Waste Licence Reg. No. 53-2 in respect of its operations in the townland of Fassaroe, Bray, Co. Wicklow which is located at National Grid References: E3242 N2179. The aims of the review are to increase the overall annual waste inputs from 129,502 tonnes to 200,000, increase the limit on the volume of waste that can be composted from 2,000 tonnes to 10,000 tonnes annually, relocate the composting plant, continue the processing of C&D waste externally, allow the discharge of sanitary and process wastewater to the municipal sewer, amend the landfill capping system and amend the licensable area. It is not proposed to change the types of waste accepted at the facility which will remain: Non-hazardous - Household, Commercial and Construction & Demolition waste.

The relevant waste disposal and waste recovery activities, as per the Third and Fourth Schedules of the Waste Management Acts 1996 to 2003, and the Waste Management (Licensing) Regulations 2004, (S.I. No. 395 of 2004) to which this application relates are:

Third Schedule – Waste Disposal Activities

Principal Activity:

- 12: ‘Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule’.

Other Activities:

- 11: ‘Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule’.
- 13: ‘Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage pending collection, on the premises where the waste concerned is produced’.

Fourth Schedule – Waste Recovery Activities

- 2: ‘Recycling or reclamation of organic substances, which are not used as solvents (including composting and other biological processes)’.
- 3: ‘Recycling or reclamation of metals and metal compounds’.
- 4: ‘Recycling or reclamation of other inorganic materials’.
- 11: ‘Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule’.
- 12: ‘Exchange of waste for submission to any activity referred to in a preceding paragraph of the Schedule’.
- 13: ‘Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced’.

An Environmental Impact Statement will be submitted to the Agency with the application. A copy of this application for a review of the waste licence, the Environmental Impact Statement and such further information relating to the application, as may be furnished to the Agency in the course of the Agency’s consideration of the application will, as soon as is practicable after receipt by the Agency, be available for inspection or purchase, at the headquarters of the Agency at Johnstown Castle, Co. Wexford.

Granary House
Rutland Street
Cork



Tel. [0 2 1] 4 3 2 1 5 2 1
Fax. [0 2 1] 4 3 2 1 5 2 2
email. ocm@indigo.ie

Planning Department,
Wicklow County Council,
County Buildings,
Wicklow.

2nd September 2004

RE: Review of Waste Licence Reg. No. 53-2

Dear Sir/Madam,

We wish to notify you, on behalf of our client *greenstar* Ltd, of our intention to make an application to the Environmental Protection Agency for the Review of Waste Licence Reg. No. 53-2 for its Bray Depot in the townland of Fassaroe, Bray, Co. Wicklow, which is located at National Grid References E3242, N2179.

The relevant waste disposal and waste recovery activities, as per the Third and Fourth Schedules of the Waste Management Acts 1996 to 2003, and the Waste Management (Licensing) Regulations 2004, (S.I. No. 395 of 2004) to which this application relates are:

Third Schedule – Waste Disposal Activities

Principal Activity:

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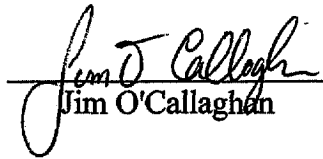
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- 3: 'Recycling or reclamation of metals and metal compounds'.
- 4: 'Recycling or reclamation of other inorganic materials'.
- 11: 'Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule'.
- 12: 'Exchange of waste for submission to any activity referred to in a preceding paragraph of the Schedule'.
- 13: 'Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced'.

An Environmental Impact Statement will be submitted to the Agency with the application. A copy of this application for a review of the waste licence, the Environmental Impact Statement and such further information relating to the application, as may be furnished to the Agency in the course of the Agency's consideration of the application will, as soon as is practicable after receipt by the Agency, be available for inspection or purchase, at the headquarters of the Agency at Johnstown Castle, Co. Wexford.

Yours sincerely,


Jim O'Callaghan

0307204/JOC/PS

c.c. Mr. Micheal Geary, *greenstar* Ltd.

2. ARTICLE 12 (1)

The following is provided in compliance with Article 12(1) of the Waste Management (Licensing) Regulations, 2000.

Article 12 (1) (a)

Applicant Details

greenstar Ltd.,
Bray Depot,
Fassaroe,
Bray,
Co. Wicklow.

Telephone No: 01 - 2829610
Fax No. 01 - 2050774

Name and Address for Correspondence

Mr. Micheal Geary,
greenstar Ltd.,
Unit 6, Ballyogan Business Park,
Ballyogan Road,
Sandyford,
Dublin 18.

Telephone No: 01 - 2947900
Fax No. 01 - 2947990

Article 12 (1)(b)

The relevant planning authority is Wicklow County Council.

Article 12 (1)(c)

The proposed changes to facility activities will result in the discharge of a trade effluent and sanitary wastewater to a new foul sewer on an adjoining property which in turn will connect to a foul sewer controlled by Wicklow County Council. Details of the quality and volume of the wastewater is presented in Section 5 of the EIS that accompanies this application. The location of the outfall from the facility connecting to the new foul sewer is shown on Drawing No. B8575-C003-A Proposed Site Layout with Drainage and Site Boundary.

Article 12 (1)(d)

The facility is located at Fassaroe, Bray, County Wicklow. It is in the townland of Fassaroe at National Grid Reference: E3242 N2179.

Article 12 (1)(e)

The facility is a non hazardous waste materials recovery and the transfer operation. Wastes are processed and treated on-site to recover materials that are suitable for recycling and to minimise the quantity of treated waste disposed to residual landfill. The current Waste Licence (Reg. No. 53-2) permits the composting of biodegradable waste at the facility.

Article 12 (1)(f)

The relevant activities as per the Third and Fourth Schedules of the Waste Management Acts 1996 – 2003 will be as follows: -

Third Schedule – Waste Disposal Activities

Class 12

“Repackaging prior to submission to any activity referred to in the preceding paragraph of this Schedule”.

Waste at the site is baled and compacted prior to submission to off-site licensed landfills/recovery facilities. This is the principal waste activity undertaken at the site.

Class 11

“Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule”.

Household and commercial/industrial wastes are mixed prior to submission to off-site licensed landfills.

Class 13

“Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced”.

Wastes are stored prior to submission to off-site licensed landfills.

Fourth Schedule – Waste Recovery Activities

Class 2

“Recycling or reclamation of organic substances which are not used as solvents, (including composting and other biological processes)”.

Composting of the organic fraction of the Household and Commercial waste accepted at the facility will be carried out. Wood and green waste is shredded, plastics and cardboard are recovered for off site recycling.

Class 3

“Recycling or reclamation of metals and metal compounds”.

Metals and wire, which are recovered from the incoming waste, and aluminium cans delivered to the site separately, are stored on-site pending removal to off-site recycling facilities.

Class 4

“Recycling or reclamation of other inorganic materials”.

Inorganic materials comprising inert construction and demolition waste and glass are recovered from the incoming waste and stored pending removal off-site for recycling.

Class 11

“Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule”.

Inert construction and demolition waste, both delivered to and recovered on-site, are used in the reclamation and restoration of the site.

Class 12

“Exchange of waste for submission to any activity referred to in a preceding paragraph of this Schedule”.

Exchange of waste recovered at the site may be undertaken at sometime in the future in the context of future off-site waste projects.

Class 13

“Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced”.

Wastes are stored prior to submission to off-site permitted/licensed recycling and reclamation facilities.

Article 12 (1)(g)

All of the Household and Commercial wastes accepted at the facility are currently processed and stored on-site pending transfer off-site for recovery or disposal at appropriately licensed/permitted off-site facilities. Construction and Demolition (C&D) wastes are processed on-site and suitable components are used in the site restoration works, with the non-suitable residue removed off-site for recycling or disposal.

With the exception of the small quantities of machinery batteries, hazardous and liquid wastes are not being accepted at the site. It is not proposed to alter the types of waste accepted at the facility from that specified in Condition 1.4.1 and Table A.1 of the current waste licence.

The amended Table A1 below includes the proposed increases to the total quantity and individual categories of wastes. The relevant European Waste Catalogue Codes for the wastes are presented in Tables 5.1 and 5.2 of the Annual Environmental Report for 2003 in Appendix 2. Given the mixed nature of the waste received and processed at the facility it is not possible to provide accurate predictions of the quantities of waste broken down into individual EWC codes. However, the EWC codes and quantities of the individual wastes will be presented in future AERs. *greenstar* is also seeking approval to amend the maximum quantities of the different categories of waste that can be accepted at the facility provided that the total quantity of the waste is not exceeded. Further information on this is presented in the Section dealing with compliance with Article 12 (3)(a).

Table A.1 Waste Categories and Quantities

WASTE TYPE	MAXIMUM (TONNES PER ANNUM) ^(Note 1)
Household waste	38,600
Commercial	107,358
Construction and Demolition	54,040
Hazardous Waste (Machinery Batteries)	2
TOTAL	200,000

Note 1: The quantities of the different categories referred to in this table may be amended with the agreement of the Agency provided that the total quantity of waste specified is not exceeded.

Article 12 (1)(h)

Details on the raw and ancillary materials, substances, preparations, fuels and energy that are utilised at the facility are included in Section 16 of the EIS which accompanies this application. It is envisaged that the increase in waste inputs will result in an increase in fuel and energy usage. The actual increases in usage will be reported to the Agency in future Annual Environmental Reports (AER).

Article 12 (1)(i)

The proposed increases in the waste volumes accepted for processing will not result in any changes to the current plant, methods, processes and operating procedures that are currently employed or envisaged under the conditions of the current licence conditions, with the exception of the biowaste treatment system.

The plant used to process the household, commercial and C&D waste have the capacity to accommodate the proposed increases in waste inputs and will meet the duty and standby capacity requirements specified in Condition 3.9.1 of the current licence. Details of the capacity of the plant are included in Section 5 of the EIS that accompanies this application.

Details of the proposed biowaste treatment activities including the location, treatment methodology and expected emissions are presented in Sections 5, 10 and 11 of the EIS that accompanies this application. The detailed design of the treatment facility will be completed following the receipt of the amended licence. This will be deemed a Specified Engineering Works and the design will be submitted to the Agency for approval before the works commence.

Article 12 (1)(j)

Compliance with paragraphs (a) to (d) of Section 40 (4) of the Waste Management Act 1996.

Section 40 (4) (a)

Details of the emissions from the proposed extension are presented in Sections 8, 9, 10 and 11 of the EIS which accompanies this application. The emissions will not result in the contravention of any relevant standard or emission limit prescribed under enactment.

Section 40 (4) (b)

The facility operations, when carried out in accordance with licence conditions, will not cause environmental pollution.

Section 40 (4) (c)

The site activities and proposed amendments to the current licence conditions are based on best management practice and take into consideration the Draft BAT Guidance Note for the Waste Sector: Waste Transfer Activities published by the EPA.

Section 40 (4) (d)

greenstar Ltd is a wholly owned subsidiary of *greenstar* Holdings Ltd. A certified Copy of the Certificate of Incorporation of *greenstar* Ltd and *greenstar* Holdings Ltd are included in Appendix 1 of this application.

It is not proposed to amend the current management structure at the facility. Facility personnel with responsibility for the management of the waste activities comply with the requirements of Condition 2.1 of the current licence. Details of the levels of training and experience of the current site management are presented in the AER for 2003, which is in Appendix 2 of this application.

In 2001 Noble Waste Disposal Limited, Fassaroe, Bray, Co. Wicklow (Waste Licence No. 53-1), now trading as *greenstar* Ltd and a fully owned subsidiary of *greenstar* Holdings Ltd, was convicted of the following offences: -

1. That on the 22nd day of March 2001 Noble Waste failed to submit to the Agency the copies of all environmental data which related to the facility in the manner provided in Condition 3.7 of the Waste Licence.
2. That on the 12th day of December 2000 Noble Waste failed to maintain adequate records as required by Condition 3.13 of the Waste Licence.
3. That on the 12th day of December 2000 Noble Waste failed to render all tank and drum storage areas impervious to the materials stored therein and to bund same as required by Condition 4.12.2 of the Waste Licence.
4. That on the 22nd day of March 2001 and in breach of Condition 5.14 of the Waste Licence Noble Waste placed or allowed waste to accumulate outside the Transfer Building other than baled cardboard in fully enclosed trailers/containers or as otherwise agreed with the Agency.
5. That on the 1st January 2001 and continuing up to 30th September 2001 and in breach of Condition 8.2 of the Waste Licence Noble Waste failed to submit a detailed Restoration and Aftercare Plan for the facility to the Agency for approval.

In 2003 N. Murphy Waste Disposal Limited, Sandyhills, Saint Margerets, County Dublin (Waste Licence No. 134-1), now trading as *greenstar* Materials Recovery Ltd – St. Margerets Depot was convicted of the following offences: -

1. That on the 5th day of February 2002 Murphy Waste did dispose of waste at a facility in breach of Condition 5.2.1 of Waste Licence (Register No. 134-1) by accepting garden waste and food stuff wastes.
2. That within the period commencing on the 1st day of January 2002 and ending on the 31st day of January 2002 Murphy Waste transferred the control of waste to Murphy Concrete Manufacturing Limited being a person other than the appropriate person contrary to the provisions of Section 32 Subsection (2) of the Waste Management Act 1996 (as amended by Section 5 of Statutory Instrument 164 1998).

The relevant section of the profit and loss account for the facility for the year ending 2003 is included in Appendix 1 of this application. An Environmental Liabilities Risk Assessment (ELRA) for the facility, which addresses liabilities arising from the carrying on of the proposed waste activities, is included in Appendix 3 of this application.

The ELRA includes details of the financial provisions in place to address any environmental liability including insurance cover to the sum of €6,350,000 for any one occurrence. There is also a €2,000,000 accrual on the balance sheet for *greenstar* Recycling Holdings Ltd. for last year. This fund is also available to cover any environmental damage caused at the Fassaroe facility.

Section 40 (4) (f)

Energy will be used efficiently in the carrying on of the activity

Section 40 (4) (g)

Noise from the activity concerned will comply with and will not result in the contravention of any regulations under Section 106 of the Act of 1992.

Article 12(1)(k)

Particulars of the source location, nature, composition, quantity, level and rate of emissions arising from the activity and the periods during which such emissions are made are presented in the EIS that accompanies this application.

Article 12 (1)(l)

An assessment of the effects of emissions from the facility resulting from the proposed amendments to the current Waste Licence is presented in the EIS that accompanies this application.

Article 12 (1)(m)

With the exception of the relocation of the biowaste treatment plant, the proposed amendments to the current licence conditions will result in one change to the location of groundwater/gas monitoring point BH-06. BH-06 is an upgradient groundwater monitoring well and is located close to the existing site entrance. The construction of a new roundabout at the existing site entrance will result in the loss of BH-06 and a replacement required. A proposed alternative is shown on Drawing No. 03072 - 01 (BH-06 A).

greenstar will, as stipulated in Condition 3.17.4.1 of the current licence, provide a monitoring point for the biowaste treatment plant prior to the start of composting operations.

Article 12 (1)(n)

Waste oils generated during plant and vehicle maintenance will be collected and sent off-site for recycling.

Article 12 (1)(o)

The waste activities will not result in any changes to the types or method of off-site treatment or disposal of solid and liquid wastes other than process and sanitary waste water. The off-site treatment or disposal of all wastes are regulated by Condition 5.5 of the current licence.

Article 12 (1)(p)

The existing measures, including emergency procedures, to prevent unauthorised or unexpected emissions and minimise the impact on the environment are described in the EIS that accompanies this application. *greenstar* has prepared an Emergency Response Procedures for the facility in compliance with Condition 9.2 of the current licence.

Article 12 (1)(q)

The proposed amendments to the current licence will not impact on the measures for the closure, remediation and aftercare of the facility as regulated by Condition 4.1 of the current licence. *greenstar* is seeking to amend the restoration measures, specifically the capping system specified in Condition 4.4.2 of the current licence. Details of the proposed amendments are described in Section 3 of this application, which deals with compliance with Section 12 (3) (a) of the 2000 Regulations.

Article 12 (1)(r)

Not applicable as the activity is not a landfill.

Article 12 (1)(s)

The activity is not an activity to which the European Communities (Major Accident Hazards of Certain Activities) Regulations, 2001 (S.I. No. 476 of 1986) apply..

Article 12 (1)(t)

The activity is not one that gives rise or could give rise to an emission into an aquifer containing List 1 and II substances specified in the Annex to the Council Directive 80/68/EEC of 17 December 1979.

Article 12(l) u

A non-technical summary of the information provided in accordance with paragraphs (a) to (t) of Article 12 (1) is in Section 6 of this application.

3. ARTICLE 12 (3)(a)

The relevant conditions of the current licence that are the subject of the review and grounds for the application are, as required by Article 12 (3) (a) of the 2000 Regulations, as follows.

Condition 1.2

As part of an agreement reached with the owner of an adjoining property in relation to obtaining a connection to a new foul sewer, *greenstar* intends to transfer ownership of a small portion of the licensed area at the existing site entrance. No waste activities have been carried out on the portion of the current licensed area involved in the ownership transfer. *greenstar* is seeking to amend the licensed area to enable the proposed transfer to proceed. The existing licence area is shown on Drawing No. B7498-C012-C and proposed licence area is shown on Drawing No. B8575-C003-A.

Condition 1.4

Condition 1.4 stipulates that only those waste categories and quantities listed in *Schedule A: Waste Acceptance* of the licence shall be accepted at the facility. Schedule A sets a maximum overall limit of 129,502 tonnes of waste, with individual limits set for Household Waste (25,000 tonnes): Commercial Waste (69,500 tonnes): Construction and Demolition Waste (35,000 tonnes) and Hazardous Waste (2 tonnes of machinery batteries).

greenstar's business development programme has identified a market opportunity to significantly increase the volumes of waste material that can be accepted at the facility for treatment and recycling. *greenstar* predicts a growth of 55% in the volumes of such waste over the next two to three years.

To allow *greenstar* to develop this market opportunity, *greenstar* is seeking to increase the total limit set for all wastes accepted at the facility and the limits set for the individual categories.

greenstar is also seeking the right, subject to the prior agreement of the Agency, to amend the quantities of the different categories of waste accepted at the facility provided that the total quantity of 200,000 tonnes is not exceeded. The revised limits are presented in the amended Table A.1.

Table A.1 Waste Categories and Quantities

WASTE TYPE	MAXIMUM (TONNES PER ANNUM) ^(Note 1)
Household waste	38,600
Commercial	107,358
Construction and Demolition	54,040
Hazardous Waste (Machinery Batteries)	2
TOTAL	200,000

Note 1: The quantities of the different categories referred to in this table may be amended with the agreement of the Agency provided that the total quantity of waste specified is not exceeded. The quantity of C&D waste may be increased for the purpose of restoration of the landfill.

Condition 1.6

Condition 1.6 restricts the facility operational hours to 7:30 – 21:00 Monday to Saturday inclusive and waste acceptance hours to 7:30 – 19:00 Monday to Saturday inclusive. Waste is not accepted at the facility on Bank Holidays.

Commercial customers are increasingly requesting early morning/late evening collection of wastes to avoid business disruptions. Traffic restrictions in urban areas also require early morning/late evening collections. Therefore greenstar is seeking to amend Condition 1.6 of to allow for the hours of operation/acceptance to be amended with the Agency's approval.

Condition 3.16.1.1

Condition 3.16.1.1 requires that the trial biodegradable waste composting unit and biofilter and associated infrastructure at the location shown on Drawing No. B7498-C012-C Existing Licensed Layout Plan & Existing Site Boundary. This location was selected to accommodate a trial composting system with a capacity to process 2000 tonnes per annum.

greenstar is applying to increase the quantity of waste that can be composted from 2000 tonnes to 10,000 tonnes per annum. The increased treatment capacity requires additional space to accommodate the biowaste treatment plant. *greenstar* is seeking approval to relocate the biowaste system to the alternative location shown on Drawing No. B8575-C003-A Proposed Site Layout Plan with Drainage & Site Boundary.

Condition 4.4.2

Condition 4.4.2 specifies the final capping for the portion of the site that was previously used to landfill inert waste. The capping system incorporates a top layer of subsoil and topsoil which is underlain by a drainage layer, a low permeability (1×10^{-9} m/s) later and a landfill gas layer. The capping system is intended to prevent the percolation of incident rainfall through the waste so as to minimise the generation of leachate and to facilitate the collection of landfill gas.

greenstar considers, based on the groundwater, leachate and landfill gas monitoring conducted at the facility in accordance with the licence conditions, that the capping system specified in Condition 4.4.2 is not required to ensure that the former landfill areas do not result in any short or long term environmental impacts.

The environmental monitoring programme has demonstrated that the landfill areas are not having any perceptible impact on surface water or groundwater quality. The landfill gas monitoring programme has established that although carbon dioxide is being generated at the site in relatively low levels, there is no evidence that significant quantities of biodegradable wastes have been deposited at the site. It is expected that the volumes of carbon dioxide will decrease over time rendering the need for a collection system unnecessary. An assessment of the impacts caused by the existing operations is presented in the EIS that accompanies this application.

greenstar prepared a Report on the Extent of Capping and Landfilling at the Site in accordance with condition 4.4.1 of the current licence. This report was submitted to the EPA in July 2003 and a copy is included in Appendix 4 of this application. The Report presented the following proposal for the capping of the areas of the site previously used for landfilling.

Following the ending of landfilling at the site temporary capping, consisting of subsoil and stone, was placed on the landfill areas. As a topographic survey was not undertaken prior to its installation, the depth of capping cannot be confirmed at any given location. However, in recent years, excavations for various activities have indicated that the depth of capping varies between 0.5 - 1.5 m across the site.

When the Phase 1 and 2 development works are completed, which are expected to be by the end of 2004 most areas previously landfilled, other than sideslopes will be covered by impermeable hardstand comprising 1 - 2 m of subsoil and 0.25 - 0.5 m stone sub-base and concrete/tarmac finish. It is proposed to place 1 - 2 m of subsoils and 0.25 - 0.5 m of topsoil on the unpaved areas and then plant these areas. Both hardstanding and unpaved areas will be profiled in accordance with the restoration plan.

The restoration profile, the extent of hardstand and the planting of topsoiled areas will minimise the entry of incident rainfall through the capping to previously landfilled material. This will further reduce the minimal risk of negative impacts on the facility's environs.

greenstar is seeking to have the capping system specified in Condition 4.4.2 amended to permit the capping of the landfill areas in accordance with the measures proposed in the Report on the Extent of Capping and Landfilling at the Site.

Condition 5.1.1

Condition 5.1.1 requires that the processing of C&D waste and non-putrescible commercial/industrial waste shall be processed indoors within 2 years of the date of issue of this licence or when the proposed transfer station Phase II has been constructed whichever is the earlier, or otherwise agreed with the Agency.

greenstar proposes to relocate the processing of non-putrescible commercial/industrial waste indoors following the completion of the Phase I building. It is envisaged that the construction will be completed by the end of 2004 and the processing plant will be relocated by end of January 2005.

For operational reasons it is more efficient to continue processing the C&D waste externally rather than internally. The external operation allows the delivered material and the processed material to be stockpiled close to the processing plant which minimises the distance travelled by the loading shovels and avoids disruption of other waste processing activities.

The environmental monitoring programme conducted at the site in compliance with licence conditions has not identified any significant adverse environmental impact associated with the external operation of the C&D processing plant. *greenstar* considers that there are no overriding environmental reasons to move the C&D processing plant indoors.

greenstar is seeking to amend the timeframe specified in Condition 5.1.1 to allow the processing of C&D wastes to continue externally.

Condition 5.4.1

Condition 5.4.1 stipulates that the trial composting unit shall not process more than 2,000 tonnes of biodegradable and green waste per annum. It was initially intended to carry out a trial of the proposed composting system to demonstrate its viability prior to going to large scale processing. Based on the experience of composting at other facilities, obtained in the period following the issue of the current licence, *greenstar* is of the opinion that the composting operation permitted under Condition 5.4.1 will be successful and that a trial period will not be required.

greenstar has identified an opportunity to significantly increase the volume of biodegradable waste that could be composted at the facility. In order to avail of this opportunity *greenstar* is seeking to increase the limit for composting from 2,000 tonnes per annum to 10,000 tonnes and to increase the design capacity of the composting system. The layout of the proposed biowaste treatment area including drainage is shown on Drawing No B8575-C005-A. Elevations of the proposed in-vessel tunnels and Aerated Static Piles are shown on Drawing Nos. B8575-C006-A and B8575-C007 respectively.

Condition 5.5.1 and 5.5.2

Conditions 5.5.1 And 5.5.2 requires *greenstar* to obtain the Agency's prior approval for all recycling/treatment facilities to which wastes are consigned from the facility and also prior approval for all waste collectors transporting waste to and from the facility. It has been *greenstar's* experience that Agency approval has on occasion been delayed resulting in financial losses through not being able to avail of more cost effective service providers.

greenstar is seeking to amend the licence condition to allow the use of waste collectors and waste treatment/disposal facilities which have the appropriate permits/licences without the prior approval of the Agency. As part of its service provider approval process *greenstar* will require the service providers *greenstar* requires that all new service providers submit copies of all applicable permits and licences before availing of their services.

greenstar will also require prospective service providers to submit details of any legal notices or prosecutions taken against them under the Waste Management Act 1996. *greenstar* will maintain records of all service providers, including Waste Permits, Licences and Waste Collection Permits at the facility.

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4. ARTICLE 12 (4)

Article 12 (4)(a)

A copy of the relevant page of the newspaper in which the notice in accordance with Article 6 has been published is included in Section 1 of this application.

Article 12 (4)(b)

A copy of the text of the notice erected in accordance with Article 7 is included in Section 1 of this application.

Article 12(4)(c)

A copy of the notice given to the planning authority is included in Section 1 of this application.

Article 12(4)(d)

The position of the notice in accordance with Article 7, is show on Drawing No. 03072-B2. Drawings showing the points at which monitoring and sampling are undertaken are shown on Drawing No. 03072-01.

Article 12(4)(e)

The fee for the review of the waste licence, €15,000, as specified in Article 41(3) and the Second Schedule of the Waste Management (Licensing) Regulations 2004, is enclosed. The fee includes for: -

- The disposal of waste (other than hazardous waste) at a facility (other than a landfill facility) where the annual intake exceeds or is likely to exceed 100,000 tonnes (Waste Activity 7).

5. ARTICLE 13 (1)

Three copies of an EIS accompany this application.

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