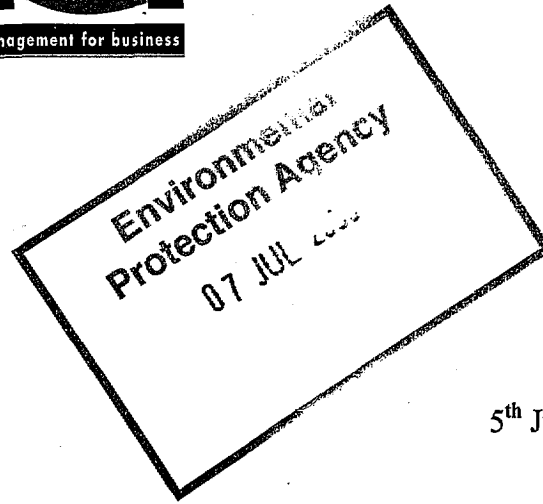


Granary House  
Rutland Street  
Cork



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Licensing Unit,  
Office of Licensing & Guidance,  
Environmental Protection Agency,  
Headquarters,  
P.O. Box 3000,  
Johnstown Castle Estate,  
Co. Wexford.



5<sup>th</sup> July 2005

RE: Notice in Accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations - Kings Tree Services Ltd - Reg. No. 218-1

Dear Sirs,

Please find enclosed, on behalf of Kings Tree Services Ltd, an original and 2 no. copies of Article 12 Compliance. Also enclosed is 2 no. copies of Article 12 responses on CD in pdf format as requested.

If you have any queries, please call me.

Yours sincerely,

  
Jim O'Callaghan

0411701/JOC/PS

Encs.

c.c. Mr. Paddy King, Kings Tree Services Ltd.



**ARTICLE 14(2)(B)(II) FURTHER INFORMATION**

**PARTICULARS AND EVIDENCE FOR**

**KINGS TREE SERVICES LTD**

**WASTE LICENCE APPLICATION NO. 218-1**

**ARTICLE 12 COMPLIANCE**

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**Prepared For: -**

Kings Tree Services Ltd.,  
Glaskenny,  
Enniskerry,  
Co. Wicklow.

**Prepared By: -**

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

**5<sup>th</sup> July 2005**



**Article 14(2)(b)(ii) Further Information**

**Particulars and Evidence For**

**Kings Tree Services Ltd**

**Waste Licence Application No. 218-1**

**Article 12 Compliance**

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**Prepared For: -**

Kings Tree Services Ltd.,  
Glaskenny,  
Enniskerry,  
Co. Wicklow.

**Prepared By: -**

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

**5<sup>th</sup> July 2005**

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## 1. INTRODUCTION

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In accordance with the Notice issued in accordance with Article 14(2)(b)(ii) of the Waste Management Licensing Regulations, Kings Tree Services Limited (KTS) has prepared the following information requested by the Environmental Protection Agency (Agency) in relation to the application for a Waste Licence, Application Register No. 218-1, for a green waste composting facility at Coolbeg, Co. Wicklow.

Section 2 contains the responses to the various requests by the Agency. For ease of interpretation each of the requests are presented in italics followed by KTS's response.

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## 2. ARTICLE 12 COMPLIANCE REQUIREMENTS

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- 1. Please provide a site-specific risk assessment, based on clear, independent scientific evidence which shows that bioaerosol levels can be maintained at appropriate levels at the above proposed facility which may arise from the receipt, shredding, composting and storage of green waste. In your assessment, please provide evidence that this proposed operation will not have any negative impacts on the nearest sensitive receptor site i.e. the residential property that is in the vicinity of the proposed facility or any proposed development adjacent the site.*

A site-specific risk assessment which shows that bioaerosol levels will be maintained at appropriate levels is included in Appendix 1. The report concludes that the distance from bioaerosol generating areas of the site to the nearest sensitive receptors (all >200 m) and the measures specified in the proposed bioaerosol control plan will mitigate any potential negative impacts at each of the receptors.

- 2. Please provide a description of any proposed mitigation measures (e.g. berms etc) pertaining to noise levels that might arise from the shredding and screening operations of green waste at this proposed facility taking into account any negative impacts on the nearest sensitive receptor site i.e. the residential property that is in the vicinity of the proposed facility or any proposed development adjacent to the site.*

Attachment E.5 of the Waste Licence Application and Section 6.5 of the Project Description that accompanied the application refer to noise prediction modelling. The modelling was conducted by AWN Consulting Ltd and the objective was to determine the likely impact of noise from the facility at the nearest noise sensitive locations. The results of the modelling are summarised in the application, but it appears that the full report was not included. A copy of the report, which takes into account local sensitive receptors, is included in Appendix 2 of this response.

The influence of a proposed dual carriageway which includes a proposed noise barrier between the site and the receptors to the east was not taken into account in the modelling, as it's precise location was not known at that time. It is however considered likely that the noise impacts from the site would be further reduced due to this noise barrier.

3. *Please provide a description of the proposed mitigation measures pertaining to dust arising from the shredding screening, composting and curing operations of green waste at this proposed facility taking into account any negative impacts on the nearest sensitive receptor site i.e. the residential property that is in the vicinity of the proposed facility or any proposed development adjacent the site.*

There is the potential for dusts generation during the pre-treatment (shredding) stage. The shredding unit will be fitted with a dust suppression system which will be activated when the shredder is in use.

The moisture content of the material during all stages of the composting process, including maturation and post composting screening will be maintained at a level that optimises the composting process. The windrow turner will be fitted with a water sprinkler system which will be used to maintain the moisture content in the windrows in the optimum range. This will minimise the potential for the generation of dusts during the composting process. The finished product will have a relatively high moisture content that will minimise the potential for dust emissions during the screening process and wind blow from the finished product stockpiles. In addition a dust suppression system will be fitted to the screen machine and will be activated if required during the screening.

The nearest residential property is located approximately 150 m north east of the north eastern boundary. It is proposed to use the northern and north eastern sections of the site for finished product storage and a maturation area. It is considered unlikely that there will be significant dust generation from these activities. The activity which has the greatest potential for dust generation i.e. the pre-treatment (shredding) will be located in the southern portion of the site approximately 350 m from the nearest residence. The impacts of dust from the proposed operations on the nearest residential property is considered to be negligible.

The Greenstar landfill is located downwind (west) of the KTS facility. The areas where Greenstar staff will be based i.e. the landfill footprint and the site administration offices are both greater than 400 m away from the site boundary. Considering the proposed mitigation measures, the facility location and prevailing wind direction it is considered unlikely that dust emanating from the facility will have a significant impact on the landfill.

4. *Please provide details on the method(s) that you propose to use to transfer water from the lagoon storage facility to the composting material in the windrows. Provide an estimate of the quantity of water that will be required in the composting process and how this amount fits into your water balance calculations as outlined on Page 21 of the Project Description proposal?*

The windrow turning machine will be fitted with water sprinkler nozzles, which will be used to add water as required. These will be located on the arm of the machine, which goes across the top of the windrow and are supplied from a connection at the base of the machine.

Water will be removed from the leachate storage lagoon using a flexible hose and vacuum tanker. The tanker will be taken to the windrow machine using a tractor and the flexible hose connected to the windrow machine as required.

Water balance calculations were prepared to assess the likely volumes of leachate that will be generated in order to provide adequate storage capacity. As stated on Page 21 of the Project Description, the water balance calculations assume that no water is removed from the lagoon in the one week storage period and that there will be no evaporative losses. This assumption is made as a precaution against under sizing the leachate storage lagoon. The water balance calculations therefore remain unchanged.

In the event that leachate is not generated, as for example in dry periods, water obtained from the on-site groundwater abstraction well will be used to maintain the optimum moisture conditions in the windrows. The water will be applied in the same manner as that removed from the storage lagoon.

5. *Describe how and when (frequency of removal) the finished compost will be removed off-site and how do you propose to use the product?*

The product will be loaded loosely using a front end loader onto trucks for removal off-site to its final destination/end market. KTS anticipates that their existing customers for wood chips, which are generated in the tree services business, will accept finished compost product. KTS also expect to develop new markets including local authorities and possibly to supply the landscaping requirements of road construction projects in the locality. There are no proposals to bag any material as yet, but this option will be kept under review.

In the initial phase it is estimated that approximately 10 tonnes of finished product will be produced daily and one truck will be loaded with compost on average every 2 days. At the projected maximum annual production of 25,000 tonnes of finished product at a maximum of 100 tonnes/day, 5 trucks will be loaded with compost every day.

6. *On Page 8 of the non-technical summary under the heading Leachate, last sentence it is stated: 'It is therefore considered that further mitigation measures are required'. Please explain/clarify this statement.*

This sentence should read 'It is therefore considered that further mitigation measures are not required'.



7. *Will any of the Construction & Demolition wood waste contain biocide treated wood?*

It is not proposed to accept biocide treated wood at the facility.

### **Non-Technical Summary**

The information supplied in response to this notice does not impinge on the non-technical summary.

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