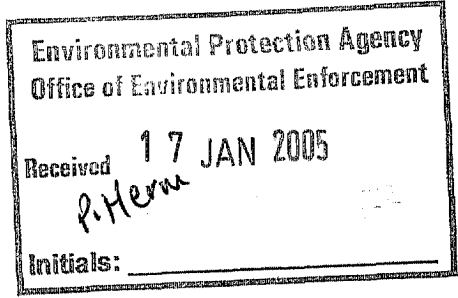


53-3

Sub ①



Philip Lardner
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10 January 2005

EPA Headquarters
Waste Licence Admin.
P.O.Box 3000
Johnstown Castle Estate
Co. Wexford.

**Re: Waste Licence ~~53-3~~ Noble Waste Disposal Ltd.
Fassaroe, Bray, Co. Wicklow.**

Dear Sir,

We understand that Greenstar / Noble Waste Disposal Ltd. have applied to the EPA for the renewal or alteration of the above licence and would like to offer the following observations and comments for your consideration. We live adjacent to this waste-recycling centre, about 150-200 metres distant, and are directly affected by the daily operations of this facility in a number of ways:

Dust and Litter: This facility continues to process construction and demolition waste, wood, metal and plastics outdoors and without effective screening. The dust and litter from these operations is so bad that we cannot open any doors or windows. We painted the front of our home last summer and the paintwork was badly spoiled by dust and wood-fibre sticking to it while the paint was drying. Our home is situated, more or less, directly down wind of the facility and we are plagued by dust and litter from this site. Some plastic netting has been erected around parts of the site, but it has little effect in stopping wind-blown litter or preventing birds carrying away household waste. Our garden is constantly littered by such material. The netting is of no use in reducing the dust problem.

The current licence permits outdoor processing (trommel and screening) of materials as long as winds are no greater than Force 7. If this refers to the Beaufort scale, then force 7 (32-38mph) is a Moderate Gale! If outside processing of C&D and wood waste continues to be permitted then we would ask that this limit be significantly lowered to Force 3 (8-11mph) or less.

We understand that the original licence (53-1) stipulated that all such work was to be moved indoors as soon as sheds could be built in order to control this problem. We also understand that Greenstar/Noble have asked that they may continue these operations out of doors. My family, my neighbours, and I feel very strongly that this materials processing must not be allowed to continue outside any longer. It **must** be moved indoors as it is not only the main source of airborne pollution but also of noise (see below.)

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Noise: As mentioned above, the processing of waste out of doors is also the main source of noise from the site. The trommels and screens used for breaking up and grading C&D waste and the machines used for grinding up or chipping waste wood generate an objectionable level of noise that can be clearly heard inside our house with the doors and windows closed, and even with the TV on. The plant and machinery used to load these process machines with material also generate a high level of noise. The reversing sirens from these machines are particularly penetrating and aggravating.

I recently equipped myself with a sound metre and, on a random day with little wind, the average continuous noise level (measured from my home) never dropped below 65dB(A) and often reached 75dB(A). This is well in excess of the 55dB(A) limit set down in the licence. The licence also states that there should be no clearly audible tonal noise emissions beyond the site boundary.

The piercing noise of the reversing sirens is particularly objectionable coming from machines operating inside the sheds, as the main shed doors are never closed and they seem to amplify and direct the noise. We would ask that the EPA make it a condition that the shed doors remain closed at all times when not directly moving materials into or out of the buildings.

Lighting: The current licence does not address the problem of lighting, other than to state that "adequate lighting" must be provided on site. Greenstar/Noble have erected floodlights all around the site and on all buildings. The level of lighting is not only excessive but is particularly badly aimed, leading to an objectionable level of light pollution into the surrounding countryside and homes. The photos accompanying this letter illustrate the magnitude of the problem. The lights shine directly onto the front and side of our home and can still be seen through drawn curtains at night. The current level and disposition of the lighting is such that it prevents me from enjoying the night sky through my principle hobby of astronomy and astrophotography. It used to be possible to see the Milky-Way spread across the night sky from my home, but these lights block out all but the brightest stars in the sky. I would ask the EPA to take steps to rectify this problem in the new licence as a matter of urgency. My suggestion would be that floodlights must be aimed such that there is no light trespass beyond the boundary of the site. This is also a more efficient and effective use of the lighting as it is not wasted by lighting up the sky and surrounding countryside.

Floodlighting is only necessary when the site is being operated during the hours of darkness, during the winter, and not when the site is closed at the end of the day and at the weekend. From a security point of view, floodlights are a poor solution as they create very sharp contrast shadows. Infrared security lighting is not only invisible to the eye, but it is more suited to CCTV camera surveillance. Floodlights should be switched off when not strictly required. We have asked on several occasions that the floodlights be properly aimed, but no action has ever been taken.

Visual appearance: This facility is particularly unsightly given its location relative to the beautiful view of the two Sugarloaf Mountains, the Glen of the Downs and Glencree. Over the years the operators and management of the Greenstar/Noble facility have promised to screen the site by planting fast growing trees on the earth banks surrounding the site. This has never happened. We would ask the EPA to address this matter in the new licence as a matter of urgency.

Hours of Operation: The current licence permits the facility to operate between the hours of 7.30am to 9pm Monday to Saturday. This is an increase in hours on the original licence (53-1.) Greenstar/Noble regularly operate this facility outside these hours, often as late as 11.30pm at night. We would ask the EPA to address this problem and return the hours of operation to their earlier limits, namely 7.30am to 6pm so that local residents can once again enjoy the tranquillity of their own homes and gardens without the constant roar of machinery.

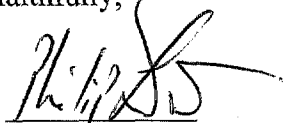
New Composting Facility: I understand that Greenstar/Noble are seeking permission to build and operate a large scale composting facility at this site, to be designed by Celtic Composting Systems Ltd. (CCS Ltd.) My neighbours and I made a site visit to the IPODEC compost depot (designed and built by CCS Ltd.) outside Waterford City in December 2004 and were very impressed by the operation being run there. Having inspected and discussed all stages of the process in detail with the plant manager, Mr. Craig Benton, I would encourage the EPA to promote this method of household/garden waste treatment in all parts of the country by way of reducing landfill and producing a harmless and usable product.


I would like to comment on only two areas of the composting operation. The first concerns the second-stage open-air piles of material removed from the first-stage reactor vessels. These piles should be covered with a permeable cover to prevent plastics from blowing away and birds from picking over the material. Such a cover would also help to minimise any odours emanating from the heaps. Celtic Composting Systems Ltd. has agreed to make this modification to their proposals for the Fassaroe site. I would ask the EPA to ensure that this has been done.

The only other area of concern is specific to the design of the Fassaroe facility, the plans for which Mr. Benton showed us. Celtic Compost originally designed the Fassaroe composting facility such that all materials handling was to be carried out inside a large shed. Materials would be delivered and unloaded, sorted, mixed and loaded into the high-temperature reactor tunnels, all within a single large shed. The reactor tunnels were accessible from inside the shed only, thus removing any possibility of littering, pollution or odours. We note, however, that on the latest version of the plans that only the unloading and mixing of materials will be carried out inside the shed. The compostable material will then have to be moved by skid-loader from the shed to the reactor tunnels outside, which are arranged in such a manner that it will necessitate an enormous number of backwards and forwards journeys to fill and empty each tunnel. This will lead to a greatly increased nuisance from noise arising from revving engines and more reversing sirens. CCS Ltd. have told us that they believe the Fassaroe plant can be arranged for fully enclosed materials handling even within this restricted site area.

We would strongly implore the EPA to make the redesign of the compost plant layout, such that all operations are carried out inside the shed, a condition of their licence.

Yours faithfully,


Philip Lardner

 Gerard Lardner

Environmental Protection Agency Office of Environmental Enforcement
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Shed doors
always open.

No effective
screening.

For inspection purposes only.
Consent of copyright owner required for any other use.

wind blown litter.

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Nets/screening on far side
of heaps only - not effective.



Wood dust piles
- a major source
of dust when
being worked or moved.

Trommel/Screenings
- a major source
of dust when being
graded or moved.

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Light pollution / trespass from the
Greenstar / Noble Facility at
Passaroe, Bray, Co. Wicklow.

- Too many floodlights.
- Badly aimed.
- Could be replaced with Infrared CCTV lighting.

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