



Onyx Ireland Limited
14A Six Cross Roads
Kilbarry
Waterford

15th March 2006

Ref: Review of Waste Licence 177-2

Dear Sir/Madam,

Please find enclosed an application for review of Waste License 177-2. Also please find enclosed a cheque for €16,000 to cover the fee for each class of activity being applied for.

Onyx would appreciate if the Agency would review this application as soon as possible as under the current terms and conditions. Onyx are likely to breach the conditions of WL 177-2 in relation to waste tonnages by August 2006.

This increase in tonnages as been brought about unexpectedly by Waterford City Council and Waterford County Council delivering waste to the Onyx facility for transfer because neither Local Authority has a landfill in which to dispose of it's waste.

With reference to WL 177-2 there were some conditions of the Proposed Decision that Onyx were not satisfied with; however we did not object as it was feared it would delay this subsequent review application.

These items are:

- 3.9.1 *The construction and demolition waste recovery area shall be within the materials handling and recycling building.*
- 3.9.2 *Only Construction and Demolition waste shall be accepted at this Area. Wastes which are capable of being recovered shall be separated and shall be stored temporarily in this area prior to being subjected to other recovery activities at the facility or transport off the facility.*
- C.3.2 *Monitoring of Emissions to Sewer*

Parameter	Monitoring Frequency	Analysis Method/Technique
Flow	Continuous	On-line flow meter with recorder
Temperature	Continuous	On-line temperature probe with recorder
pH	Continuous	pH electrode/meter and recorder

The main issues with these items are:

3.9.1 & 3.9.2

WL 177-1 was reviewed to incorporate an exterior new recycling compound that was separate from the materials handling and recycling building. The recycling compound was specifically being put in place for the storage and recovery of metal, construction and demolition waste, plastic, timber and glass. The conditions as they stand would prevent C&D recovery in the recycling compound area.

3.2

The installation of a continuous on line meters for flow, temperature and pH are excessive as the actual total flow to foul sewer in 2005 was 775m³ per which is just over 2m³ per day. Of the 775m³ almost 400m³ is used by the site welfare facilities. Such a low and intermittent flow does not justify nor warrant such continuous monitoring and the condition of the licence should be changed to grab sampling.

I trust the above is satisfactory.

Yours Sincerely



Kieran Mullins
 Onyx Ireland Ltd.