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Signature	<i>[Signature]</i>
Environmental Protection Agency, HQ. P.O. Box 3000, Johnstown Castle Estate, Co. Wexford.	

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4<sup>th</sup> April 2006

Ms. Eve O'Sullivan  
Licensing Unit  
Office of Licensing & Guidance  
Environmental Protection Agency  
P.O. Box 3000  
Johnstown Castle Estate  
Co. Wexford.

**Re: Proposed Licence 53-3 Greenstar Ltd.**

Dear Ms. O'Sullivan,

Further to your letter of 8 March 2006 enclosing a copy of the Greenstar objections to the proposed decision on 53-3, we wish to submit our comments as follows:

**Greenstar's Objection to Condition 6.2** – Their statement that our objection relates purely to the external processing of waste is a blatant misrepresentation of the facts. The noise generated from machinery operating inside the sheds and the automatic proximity warning hooters most certainly are a cause for concern to us. The doors of the work sheds are NEVER closed either during work hours or during the night or at weekends. Despite numerous calls and attempts to register official complaints in their logbook, no action has ever been taken by Greenstar to reduce this problem. We remain highly sceptical as to whether any of our complaints have in fact been logged. The automatic proximity hooter and strobe light are triggered by cats, birds and vermin that are allowed free access to the sheds after hours and throughout the night as I discovered after a weekend site visit. This problem has been made abundantly clear to the management of Greenstar at their meetings with us.

Further, the levels of noise and dust generated by the lorries and other vehicles entering and leaving the site, along with those operating around the site are already a highly objectionable and serious nuisance. Any further increase in the volume of traffic at the site or in the hours that heavy vehicles access the site would further degrade what little peace and tranquillity remains in this area. We have attended a number of meetings with Greenstar and have made this clear to them in no uncertain terms.

We therefore have no confidence that Greenstar will not abuse any further extension of their licence in this area as they have continued to do up to the present.

**Greenstar's Objection to Condition 8.1** – If memory serves, when the original planning application for the Phase 1 building was being sought we were assured by Greenstar that C&D and C&I processing would be internalised in this new building and that therefore it was not in our interests to object to it. Since then these plans have changed time and again, and time extensions have been granted to the deadline for internalising the processing of this material.

Yet again Greenstar continue to procrastinate in meeting their obligations under their existing licence and are seeking yet another extension. The internalising of the processing of the C&D and C&I waste lines has been a nebulous ideal that Greenstar/Noble have dangled in front of us since before licence 53-1. Any further latitude by the EPA on this condition would allow Greenstar to continue to string out this process indefinitely. We take serious issue with this. We would suggest that maintaining Condition 8.1 as it stands would send a clear message to Greenstar that further delay is not acceptable and that the EPA is at last prepared to use its teeth. The enforced cessation of external processing of these lines should encourage Greenstar to waste no further time in meeting their obligations.

**Greenstar's Objection to Condition 8.4.3** – During our site visit to the Waterford City composting facility, designed and operated by Celtic Compost Ltd., we were given full access to all sections of the process line and were given a detailed description of each stage by company director Mr. Craig Benton. I personally was impressed by his openness and willingness to discuss in detail every aspect of the process and to listen to our concerns. I came away from that meeting with an unexpectedly positive attitude towards this process and I believe I recommended it to the EPA on condition that similar projects were run, either directly by Celtic Compost Ltd., or to the same stringent conditions being practiced by Celtic Compost Ltd. We have no confidence in either the willingness or ability of Greenstar to run a similar facility along similar lines.

When speaking to Mr. Benton we discussed the residual steaming odour emanating from the aerated static piles (ASPs) which can best be described as a fairly strong mixture of wood-chip and ammonia that carried on the wind. Mr. Benton suggested that covering these steaming piles would not only reduce the odour but may also assist the air suction through the ASPs. He stated that such covers would not adversely affect the process or time period for curing the material in the ASPs and that he would add ASP covers to the process specification for both the Greenstar and other future projects.

**Greenstar's Objection to Condition 8.4.4 and Schedule F: Standards for Compost Quality** – Here again we see Greenstar's willingness to do only the bare minimum to process waste instead of standing out as the industry leaders that they should be by using 'best economic technology.' We would urge the EPA not to relax Condition 8.4.4 and to only allow Class 1 compost as is produced by Celtic Compost Ltd. Further, in their objection to Condition 8.4.6, Greenstar suggest that the compost produced at their Fassaroe site will be "a clean product for agricultural use." If this is true, then there is no requirement for a permit to produce Class 2 or Stabilised Bio-waste as only Class 1 compost may be used for agricultural purposes without limits.

**Greenstar's Objection to Condition 8.4.6** – Firstly, we would like to point out that Fassaroe is not an industrial estate located away from residential areas like the Waterford City facility, and has many private dwellings within just a few hundred yards of the Greenstar facility. Secondly, at the screening stage, the carbon, oxygen and nitrogen ratios are irrelevant, as is largely the moisture content, as active composting has more or less ceased. I can only assume that we visited the Waterford City composting facility run by Celtic Compost Ltd. on a typical day and that the material we saw at various stages of the process was also typical. The material we saw at the screening stage may well have had a moisture content of 50% - 60%, (indeed, it was raining on that day) but I can assure you that a large fraction of the material was more than finely divided enough to become wind blown in anything stronger than a moderate breeze. We would consider the internal screening of this material to be especially important, not only to eliminate the wind blown dust problem, but to eliminate the residual odour of ammonia which is still quite strong even in the finished product. There is also the noise of the engine driving the screen and the noise of the screening to consider. We would urge the EPA to maintain their insistence on all screening activity taking place indoors in an environmentally controlled shed.

**Groundwater Monitoring** – It would, I believe, be a mistake to reduce the frequency of water quality sampling to quarterly. Occasional inspections of the site at river level (along our shared boundary) have revealed what looks like a black leachate pooling at the base of the landfill area close to the river. Sampling in this area might be more revealing than at some of the current sampling points.

In closing, I would like to draw to your attention a minor detail that escaped my notice in Pernille Hermansen's Inspector's Report of 6 Jan '06. In paragraph 4.1-Emissions (Air) and later in paragraph 5-Restoration there is reference to landfill being carried out at this site since 1947 and up to 2000. This is in fact inaccurate. The site on which the Greenstar facility stands was, up until it was sold to Noble

Ltd. by Mr. Howard Heatly, used exclusively as a quarry for sand and gravel extraction, which had largely ceased by the early 1970's. I used to play in this quarry as a child and there was no landfill activity there at all. There was indeed a landfill (Bray UDC) further up the Glenmunder valley, accessed by Berryfield Lane, but no part of the Greenstar facility is built on or near that site. All the landfill under the Greenstar facility has taken place since it was purchased by Nobles Ltd. and subsequently by Greenstar. The activities carried on by Noble and the materials buried there had to be seen to be believed.

Yours faithfully,

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Philip Lardner  
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