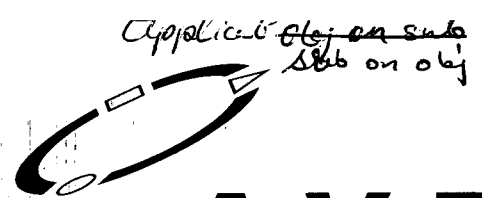


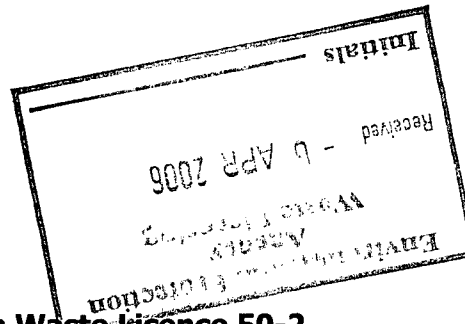
ORIGINAL



AVR

AVR - SAFEWAY Ltd.

Environmental Protection Agency,
PO Box 3000
Johnstown Castle Estate
County Wexford



6th April 2006

Ref: pdepa060406

Re: Objection to proposed decision on Waste Licence 50-2

Dear Sir/Madam

With regard to the proposed decision on Waste Licence 50-2 AVR-Safeway as the applicant wish to make the following objection. While AVR-Safeway is satisfied with the bulk of the licence there are a number of conditions that we feel need minor clarification or adjustment as outlined herein. A fee of € 500 is enclosed.

The conditions of concern include:

Condition 1 Scope

Condition 1.7 Waste acceptance

The condition currently states: "...waste shall be accepted or dispatched from the facility only between the hours of 0800 to 2200 Monday to Sunday"

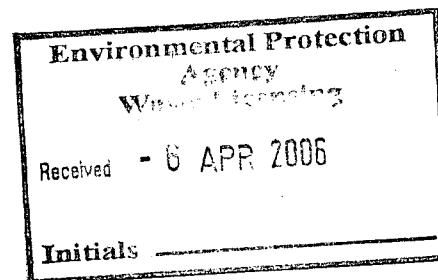
We request to amend this condition to allow for dispatch of waste from 07:00 instead of 08:00

Condition 3 Infrastructure and Operation

Condition 3.4

The condition currently states that "Sampling equipment shall be operated and maintained such that sufficient sample is collected to meet both internal monitoring requirements and those of the Agency. A separate composite sample or homogenous sub-sample (of sufficient volume as advised) should be refrigerated immediately after collection and retained as required by for EPA use."

Consent of copy for inspection purposes only. A separate copy is required for any other use.

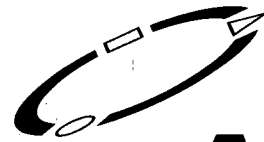


Licensed Hazardous Waste
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License No. 50-1

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AVR

AVR - SAFEWAY Ltd.

We request that this is reworded as follows:

Sampling equipment required under Schedule C: Control and Monitoring shall be operated and maintained such that sufficient sample is collected to meet both internal monitoring requirements and those of the Agency. A separate composite sample or homogenous sub-sample, where applicable (of sufficient volume as advised) should be refrigerated immediately after collection and retained as required by for EPA use.

We request this change to clarify the samples required for collection.

Condition 4

Condition 4.2.2

The condition contains the following "Emission limit values for emissions to sewer in the licence shall be interpreted in the following way:- "

We suggest that should be reformatted as follows:

Condition 4.3 Emission limit values for emissions to sewer in the licence shall be interpreted in the following way:-

Subsequently:

Condition 4.3 should be renumbered 4.3.1

Condition 4.4 should be renumbered 4.3.2

Condition 4.5 should be renumbered 4.3.3

Condition 4.6 should be renumbered 4.3.4

Condition 4.7 should be renumbered 4.3.5

Condition 5

Condition 5.7

This condition states: "Process effluent shall be tankered to a prior agreed wastewater treatment plant or authorised waste facility.

We request to amend this as follows "Process effluent shall be tankered to a prior agreed wastewater treatment plant or authorised waste facility, unless otherwise agreed by the agency.

We request this change to allow for future infrastructural developments.

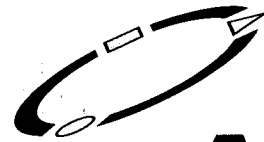


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Condition 6

Condition 6.15.1

This condition states "The licensee shall prepare, to the satisfaction of the agency a test programme for abatement equipment installed to bund M.."

We wish to amend this as follows "The licensee shall prepare, to the satisfaction of the agency a test programme for abatement equipment installed to bund R..."

We request this change as the plans submitted show the site of the scrubber as bund R not bund M.

Condition 8

Condition 8.16.9

This condition states: "All full containers shall be sealed with high tensile steel and clearly labelled and shall only be stored in bund L"

We wish to amend this as follows: "All full containers shall be sealed with high tensile steel and clearly labelled and shall only be stored in bund L or other locations as agreed with the agency"

We request this change as we can currently store asbestos in other locations following agreement with the agency.

Condition 12

Condition 12.2.3 This condition states "As part of the measures identified in condition 12.3.1....."

We wish to amend this condition to replace 12.3.1; 12.3.2 with 12.2.1 and 12.2.2 as 12.3.1 and 12.3.2 do not appear in the licence

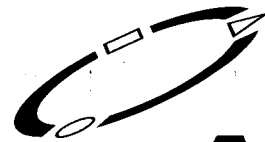
Schedule B

Schedule B.3 Emission to sewer

This schedule states that "There are no emission to sewer"

We wish to amend this to "There shall be no emissions to sewer without prior agreement with the Agency"

We wish to amend this schedule to allow for future infrastructural development.



AVR

Schedule C

Schedule C.1.1

We wish to amend this schedule as follows:

Replace the control parameter *Conductivity* with *pH* as we believe that pH is a better measure of water quality in the scrubbers WSCF-1 and AGS-1 than conductivity.

Replace the frequency of monitoring of WSCF-1 from *Daily* to *Before use* as WSCF-1 is used intermittently.

Removal of the parameter *Conductivity* from monitoring of WSCF-2 as no materials will be introduced into the fuel blending plant that would cause the production of any off gas which would not be detected by the VOC monitoring.

Schedule C.3.2 Monitoring of Emissions to Treatment Plant

We wish to delete Schedule C.3.2 from the licence as the material sent to the treatment plant is the subject of a commercial undertaking between AVR-Safeway Limited and the treatment plant operator and is not an emission. The material is monitored according to the schedule C.4 Waste Monitoring.

Schedule C.6 Groundwater Monitoring:

We wish to amend Schedule C.6 to change the frequency of monitoring of the parameters *Visual Inspection/Odour, Groundwater level, Conductivity and Total Organic Carbon* from monthly to quarterly as per Waste Licence 50-1.

Schedule C.6 Weather Station Monitoring:

We wish to amend Schedule C.6 to remove the parameters *Temperature and Precipitation* as they are not required under Condition 3.13

Best Regards,

A handwritten signature in black ink, appearing to read 'm powell'.

Mike Powell
Environmental laboratory/Compliance manager.
AVR-Safeway Ltd.

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