



Objection 1

greenstar

setting the standard

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29th May 2006

Dr. Tom McLoughlin,
The Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
County Wexford.

Re: Objection to Proposed Decision of the EPA in respect of Waste Licence Application 220-1

Dear Dr. McLoughlin,

In accordance with Section 42 of the Waste Management Act 1996 we wish to object to the above Waste Licence. We request that the following conditions be amended as follows;

Condition 3.1

The licensee shall establish all infrastructure referred to in this licence in advance of the commencement of the licensed activities or as required by the conditions of this licence.

The facility is currently operational, holding a waste permit granted by Wexford Co Co. Following the grant of an EPA waste licence and the conditions contained therein Greenstar propose to apply for planning permission and commence detailed design, tender and construct the infrastructure approved in accordance with Schedule D of the Licence. It is envisaged that this process will take a period of some 18 months from the grant of Licence to completion.

Greenstar request that a period of 18 months from the date of grant of Waste Licence 220-1 is provided to enable Greenstar to complete infrastructural works as outlined in the application.

Environmental
Protection Agency
01 JUN 2006

Registered in Ireland No. 325120

Directors: G. Bailey, G. Dennison, M. King,
S. Cowman, E. Bolger (Secretary)
Registered Office: Burton Court, Burton Hall Road,
Sandyford, Dublin 18.

Affiliate Organisation, CIWM
Member of the IWMA
Corporate Affiliate of the IEI

Condition 3.2

Unless otherwise agreed in writing, the building (s) to enclose the waste activities shall be constructed as described in the Application.

As Condition 3.1

Condition 3.6.2

The licensee shall provide, and maintain an impermeable hardstanding surface in the areas of the facility shown on Drawing No. 1.1.2. In addition the floor of the buildings and hardstanding areas at the facility shall be concreted and constructed to British Standard 8110 or an alternative as agreed by the Agency. The licensee shall remedy any defect in concrete surfaces within ten working days.

Reference Condition 3.1, Greenstar will be required to design, tender and construct the proposed hardstanding surface. Hence, Greenstar request that a period of six months (from grant of Licence) is permitted for these works to be completed.

Condition 3.11.1

The licensee shall provide and maintain a Wastewater Treatment System at the facility for the treatment of sanitary effluent arising on-site. The percolation area shall satisfy the criteria set out in the Wastewater Treatment Manual, Treatment Systems for Single Houses, published by the Environmental Protection Agency.

As an alternative to on-site treatment, Greenstar propose that the Condition provides for a storage tank as an alternative to store foulwater pending it's consignment from site to an appropriate wastewater treatment facility.

Condition 6.3.1

The floor of the waste transfer building shall be cleaned on a weekly basis and on a daily basis where putrescible waste is handled. The floor of the storage bays for recovered wastes shall be washed down and cleaned on each occasion such bays are emptied, or as a minimum on a weekly basis.

Where materials such as wood is stored it may not always be necessary to wash down areas. It could amount to a needless waste of clean water and generate unnecessary process water. Could this condition be rephrased to "...washed down or cleaned..."

Condition 6.16

The licensee shall ensure that groundwater monitoring well sampling equipment is available/installed on-site and is fit for purpose at all times. The sampling equipment shall be to Agency specifications

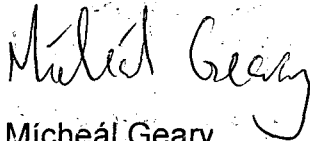
Groundwaters will be sampled by environmental consultants on behalf of Greenstar. Our consultants will own and store sampling equipment. As our consultants will be on-call and will be capable of sampling within 24 hours of a request it is proposed that it is unnecessary to store such equipment on-site.

Schedule C.2.2

Greenstar requests that the monitoring frequency of Chlorides be extended to monthly and, instead, electrical conductivity is monitored daily. Electrical conductivity would provide an indicator of chloride amongst other parameter levels.

Greenstar requests the amendments to the proposed decision as outlined above. If you have any queries in relation to the above please do not hesitate to contact the undersigned.

Yours sincerely,



Micheál Geary
for and on behalf of Greenstar Ltd.

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