

Mr Philip Wilson
Divisional Manager
Carbury Compost Limited
Drummin
Carbury
County Kildare

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13-Dec-2006

W0124-02

Re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations

Dear Mr Wilson,

I am to refer to the above referenced application for a waste licence review relating to a facility at Carbury Compost Limited, Drummin, Carbury, County Kildare. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Article 12 and Article 13 of the Waste Management (Licensing) Regulations.

You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to take the steps and supply the information detailed below.

1. On Page i of the Environmental Impact Statement, reference is made to the dipping/dunking in water and storage of straw bales for up to three days. Will the dunked straw bales be stored on aerated pads? Please clarify. Also, in the composting facility overview on Page 1.2, please clarify whether the wetted bales are stored indoors or outdoors.
2. On Page ii of the Environmental Impact Statement, insufficient information is provided on the method for the proposed recirculation/removal of air in the Phase I bunkers and waste handling area. The removal of odorous air in the Phase I bunkers and in the raw materials handling area using an air pressure system is also referenced on page 3.10 of the EIS. No explanation of this air pressure system is provided. Please provide detailed information on this aspect.
3. Page viii, reference is made to the storage of sewage effluent in the same tank (Tank B) as the floor drainage water (See also Q.7). Has any consideration been given to the possibility of human pathogens surviving after the composting



process? Do you intend to test the final mushroom substrate/compost for the presence of such pathogens? Please advise.

4. Addition of urea to substitute the poultry manure.

Prof R. Noble recommends the above (as well as other measures) as a measure to reduce odours in his Index of Measures for the Reduction of Odours from Mushroom Composting sites in Ireland. It is the understanding of the Agency that your company agreed to implement all of the Noble measures. However, no mention is made of the above measure or indeed any of Noble's measures in the application. Please clarify.

5. On Page 1.2, reference is made to nodes built into the floor of the Phase I bunkers. Please clarify the exact function of these nodes and furnish the Agency with a description of their operation.

6. On Page 2.6 the results of the flue gas monitoring of Boiler A1-1 are presented in Table 2.2.4. Where is this monitoring point located? It is not marked on Figure 2.2.1. Please clarify.

7. Section 2.6.3.1 on Page 2.22 states that all effluent generated on site will be re-used in the composting facility and no discharges to the local network are expected. If this is the case, why is the Puraflo system still needed?

8. The following drawings need to be amended and furnished to the Agency as the text of the drawings is illegible:

- 3154 CPL-'06-1.02
- 3154 CPL-'06-1.03
- 3154 CPL-'06-2.01
- 3154 CPL-'06-2.02
- 3154 CPL-'06-2.03
- 3154 CPL-'06-2.04
- 3154 CPL-'06-2.05
- 3154 CPL-'06-3.01
- 3154 CPL-'06-3.02

9. Please provide information on the proposed mitigation measures to be used to reduce the possibility of bioaerosol production at the proposed facility.

10. What provisions are made for the collection and disposal/treatment of any spills from tanks into their associated bunds?

11. No contingency has been provided in case the movement of poultry litter is restricted due to circumstances such as a disease epidemic. What substitute is proposed if this scenario were to arise?

Your reply to this notice should include a revised non-technical summary (Application Form and EIS), which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Please supply the information in the form of one original plus two copies within **six weeks** of the date of this notice. In addition submit sixteen copies of the requested information to the Agency in electronic searchable PDF format on CD-ROM. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is **W0124-02**. Please direct all correspondence in relation to this matter to *Catherine O' Keeffe, Licensing Unit, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



Donal Grant
Inspector
Office of Licensing & Guidance