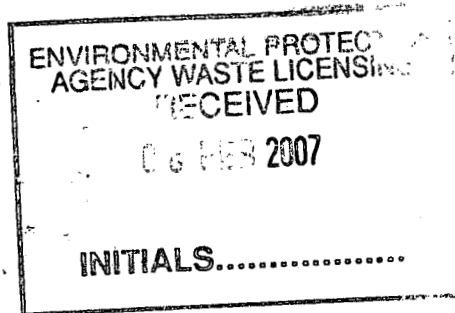
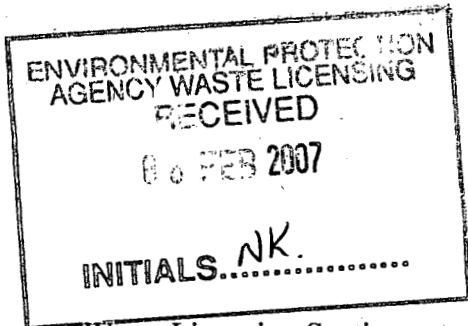




Others talk about recycling - we just do it!



Waste Licensing Section,
Environmental Protection Agency,
Johnstown Castle Estate,
P.O. Box 3000 Wexford.

February 06th, 2007

Your Ref: **W0205-1(Waste Licence- Proposed Decision)**
Our Ref: **MOC/epa/Crag/08**

Dear Sirs,

I refer to the above referenced proposed decision on the Greyhound Recycling & Recovery waste licence application in respect to a facility at Crag Avenue, Clondalkin, Co. Dublin.

Greyhound Recycling & Recovery Limited has 3 objections to the proposed licence determination. These are:

Objection 1

Condition 6.3.3 (i) states;

"Prior to the commencement of the Scheduled Activity, fast-action doors (or equivalent as agreed by the Agency) shall be installed and maintained on the entry/exit points of the Waste Recovery Buildings...."

Condition 6.3.3 (ii) states;

"Prior to the acceptance of putrescible waste at the facility, the Waste Recovery Buildings shall be fitted with an odour management system. This shall include a continuous negative air pressure system with ventilated gases being subject to treatment as agreed by the Agency. The licensee shall maintain the integrity and negative pressure throughout each Building to ensure no significant escape of odours or dust."



Nationwide Collection Service:

Dublin	Knockmitten Lane,	sales	00 353 01 450 8865	Limerick:	Galvone Ind Est.,	tel	00 353 61 403333
	Western Ind Est,	service	00 353 01 450 9977		Limerick City,	fax	00 353 61 430999
	Dublin 12 Ireland	fax	00 353 01 419 6882		Ireland		

email sales@greyhoundwaste.com www.greyhoundwaste.com

Registered in Ireland 131376

Condition 6.3.3. requires that all waste recovery buildings be fitted with rapid action access doors and an odour management system, specifically a continuous negative air pressure system with vent gas treatment. Greyhound Recycling & Recovery Limited object to the requirement that all waste transfer buildings at the licensed facility be required to have a negative air pressure system.

The applicant site contains two purpose-built waste transfer buildings. Building No.1 is dedicated to the reception, processing, and storage of source segregated and mixed dry recyclables only. Building No. 2 will be dedicated to reception, processing, and storage of mixed waste containing putrescible materials in addition to construction and demolition wastes. The infrastructural requirements and operational specification for a building used to process dry recyclables and a building processing mixed waste with putrescible contents are completely different. There is no justification for rapid action access doors or a continuous negative air pressure system in a dry recyclables transfer building. Building No.1 is currently operational as a dry recyclables recovery facility under a waste permit issued by South Dublin County Council (WP050). There have been no complaints against the facility since the commencement of activities reflecting the low nuisance potential of the activity.

Greyhound Recycling & Recovery Limited request Condition 6.3.3(i) and 6.3.3.(ii) be amended so as to apply only to waste recovery buildings receiving, processing or storing putrescible waste.

Objection 2

Condition 6.3.1 states;

"All putrescible waste, stored overnight at the facility, shall be stored in suitably covered and enclosed containers within a Waste Recovery Building, and shall be removed from the facility within forty eight hours of its arrival on site or seventy-two hours in the case of Public Holiday."

Greyhound Recycling & Recovery Limited objects to the requirement that waste stored overnight must be held in covered and enclosed containers. This is operationally restrictive and without environmental rational. The requirement is unjustified for the following reasons;

- (i) All putrescible waste material will be stored in a waste transfer building equipped with continuous negative air pressure system with ventilated gas treatment, in accordance with Condition 6.3.3. In this environment waste accepted and stored overnight will not represent an environmental or nuisance risk.
- (ii) The provision by the licensee of a high capital cost odour management system should negate the need to clear the facility floor overnight.
- (iii) The Crag Avenue waste facility will operate on a 24 hour basis. Waste will be accepted 24 hours a day. Limiting waste offloading times, or requiring that waste be transferred overnight to covered and enclosed containers, is both impracticable and obscure in this circumstance.
- (iv) The requirements of efficient, economic, and environmentally sound fleet management in addition to legislative changes are compelling waste management

companies to carry out waste collections outside of peak road usage periods. This is necessitating 24-hour waste acceptances at waste facility. Any condition which restricts this trend is environmentally unsound.

(v) New waste collection bye law introduced by Dublin City Council restricts waste collection in the central commercial district to 7pm to 12pm. This will necessitate night-time waste acceptance.

(vi) Source-segregated organic waste and waste containing putrescible content will be offloaded and stored in dedicated bunkers in the transfer building pending accumulation of sufficient volume to ship out for recovery. Transfer of this material from an odour managed environment into a covered and enclosed container overnight is not feasible or justified.

(vii) The Crag Avenue facility will be a high volume waste transfer facility. Onward movement of waste is reliant on availability and access to recovery / disposal facilities. Operational experience has shown that various factors affect the access to these third party facilities (i.e. wind disruption at landfill). Experience throughout the waste industry is that clearing the floor of the waste building at the end of the working day is not feasible irrespective of intent. The requirement to transfer of this material from an odour managed environment into a covered and enclosed container overnight is not feasible or justified.

Greyhound Recycling & Recovery Limited request Condition 6.3.1 be amended to remove the requirement of the first part, specifically that *'putrescible waste, stored overnight at the facility, shall be stored in suitably covered and enclosed containers within a waste recovery building'*.

Objection 3

Condition 6.4.1

"The floor of the Waste Recovery Buildings shall be cleared of all waste at the end of the working day. The floor of the storage areas for putrescible waste containers shall be washed down and cleaned on a weekly basis."

Greyhound Recycling & Recovery Limited objects to the requirement that the floor of the waste recovery buildings should be cleared of all waste at the end of the working day. This is operationally restrictive and without environmental rational. The requirement is unjustified for the following reasons;

(i) All putrescible waste material will be stored in a waste transfer building equipped with continuous negative air pressure system with ventilated gas treatment, in accordance with Condition 6.3.3. In this environment waste accepted and stored overnight does not represent an environment risk.

(ii) The provision by the licensee of a high capital cost odour management system should negate the need to clear the facility floor overnight.

(vi) Source-segregated dry recyclables and mixed dry recyclables are offloaded and stored in dedicated bunkers in the transfer building pending accumulation of sufficient volume to process.

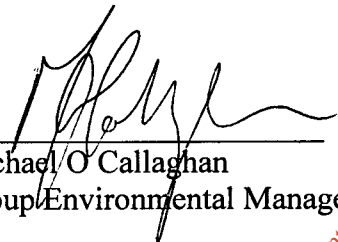
(vii) Post-processing baled segregated recyclables, segregated material streams (metal, wood, plastics), and baled mixed waste for RDF, will be stored in the waste transfer buildings pending accumulation of sufficient volumes to justify shipment off-site for recovery. Movement of these wastes off the floor at the end of the working day is not feasible or warranted as they do not pose environmental risk or nuisance.

(vii) The Crag Avenue facility will be a high volume waste transfer facility. Onward movement of waste is reliant on availability and access to recovery / disposal facilities. Operational experience has shown that various factors affect the access to these third party facilities (i.e. wind disruption at landfill). Experience across the waste industry is that clearing the floor of the waste building at the end of the working day is not feasible irrespective of intent.

Greyhound Recycling & Recovery Limited request Condition 6.4.1 be amended to remove the requirement of the first part, specifically that *'the floor of the Waste Recovery Buildings shall be cleared of all waste at the end of the working day'*

I trust that these objections will be given due consideration by the Agency.

Yours sincerely



Michael O'Callaghan
Group Environmental Manager

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