



Licensing Unit
Office of Licensing & Guidance
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
County Wexford

19 February 2007

Re: Waste Licence Application Register No. W0194-02

Dear Sir/Madam

I refer to the Agency letter dated 25/01/07 in relation to an objection to proposed decision in respect of waste licence application register no. W0194-02. Please find attached Advanced Environmental Solutions (AES) submission on the objection.

Yours sincerely


Peter Carey

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AES wishes to make the following submission in response to the Objection by the Derryguile and Kyletalesha Residents Association and Councillor Pat Bracken made to the Proposed Decision to review application register number W0194-02. The headings of responses below correspond to each of the objectors headings for grounds of objection.

1. Existing Waste Limitation

The objector raises concern regarding the residual fraction to be generated from the processing of biodegradable waste and the ultimate disposal destination for the same.

Response

The primary focus of the AES facility is to recover as much waste as practically possible. Specifically, the facility will be developed to treat biodegradable waste, which as outlined in the recent Environmental Protection Agency's *National Waste Report 2005* is essential in order to satisfy EU and National targets. The EPA Report noted that progress in diverting biodegradable municipal waste from landfill was relatively slow in 2005, and that the amount of biodegradable waste landfilled, approximately 1.3 million tonnes, was equivalent to that arising in 1995, the base year on which diversion targets are set. The Report also noted that biodegradable waste causes considerable management problems in landfills, including the generation of methane (a greenhouse gas), leachate and the attraction of vermin.

Any residual that is generated from the process will be disposed of to an appropriate facility.

2. Odour Mitigation

- (a) *The objector agrees that a facility like that proposed to divert waste from landfill might have a positive impact on the environment but suggests there is a need for an agreement between Laois Co Co and AES in order that it will have a positive impact.*
- (b) *The objector also refers to information used in an objection to a planning application for a similar facility in Co Waterford regarding the Bedminster Technology.*
- (c) *The objector states that the organic fraction from the process is not allowed to be used on land.*

Response

As outlined in point 1 above the diversion of biodegradable waste is essential in order to satisfy EU and National targets. It is unclear as to the need of agreement between Laois Co Co and AES, although it is assumed the statement relates to Laois Co Co's landfill, which is a matter for Laois Co Co.

The reference to information used in an objection to a planning application for a similar facility in Co Waterford relates to correspondence with Cairns City Council. Part of the response from Cairns City Council was omitted, specifically, a general manager, who is a representative of Cairns City Council stated that the Bedminster Plant in Cairns 'is a solution to the putrescible fraction', and that 'there is nothing wrong with the Bedminster Technology'. In addition, the Bedminster Plant in Nantucket, is held up as a model plant for other compost facilities in the USA. The individuals responsible for commissioning the Nantucket plant will also be responsible for commissioning the proposed plant at Portlaoise. It should also be noted that planning was granted for the facility in Co Waterford using the Bedminster Technology.

Technologies like the proposed Bedminster process are essential if Ireland is going to stand up and meet its EU targets, in particular, the diversion of biodegradable material from landfill disposal.

The organic fraction will have to meet specified criteria, as set out in the Standards for Compost Quality of the Proposed Decision (PD), before it is allowed on land.

3. Low Population

The objector has concerns about facility regulation.

Response

AES is committed to ensuring compliance with the final issued licence.

4. Traffic Impact Assessment & Traffic Restrictions

The objector states that they believe there will be a significant increase in traffic volumes

Response

Independent traffic consultants *Trafficwise* carried out a Traffic Assessment and concluded that *'increase in traffic and the likely impact of such traffic on the capacity and operation of the receiving road network would not be significant'*. Traffic has also been dealt with by Laois Co Co under their planning remit.

5. Alternative Locations

The objector states that alternative sites have not been considered.

Response

Alternative locations were considered as outlined in Section 1.9 of the Environmental Impact Statement (EIS) and the alternative chosen was to extend the existing waste facility.

6. Negative Impact on Supply of Clean Water

The objector states that the eventual destination for process water has not been addressed and that it will not be suitable for land spreading.

Response

The amount of process water will be restricted as much as practically possible. Any excess process wastewater generated at the site will be transported off-site to an approved wastewater treatment plant in accordance with requirements set out in Condition 8.11 of the PD.

7. Fire Control

The objector states that these types of processing facilities have demonstrated a high capability for fire hazard and that they are concerned with the risk to peat land surrounding their homes.

Response

Fire control measures are outlined in Section 2.5.7 of the EIS and it is noted that Condition 3.21.1 of the PD requires a risk assessment to be carried out. There is a significant capital expenditure to develop the facility and as such it obviously in AES's interest to eliminate any risk of fire.

8. Decommissioning Costs

The objector states that a financial bond be lodged equivalent to the decommissioning costs in the event of AES or the facility being financially non viable or in the event of AES or its assets being purchased by another company.

Response

It is anticipated that the plant will be operated indefinitely. However if the facility should close for some unforeseen reason all waste and all equipment will be removed from the facility. Waste would be removed to authorised facilities. Equipment would be recycled where possible. The building where waste activities are proposed would, (if permissible) remain and would likely be used again.

It is noted that Condition 12.2 of the PD on Environmental Liabilities includes for financial provision in relation to remedial action following anticipated events including closure.

9. Cumulative Health Implications

The objector states that their concerns on the cumulative impact on health have not been addressed.

Response

Neither AES nor AES's consultants are aware of any study or concrete evidence linking proximity of biological waste management infrastructure to deterioration in human health

10. Ongoing Odour Problems in the Area

The objector refers to current odours in the area and objects to another waste facility. The objector highlights concern relating to noise and the need for a buffer zone.

Response

Odour control measures are outlined in Section 4 of the EIS. Independent consultants *Odour Monitoring Ireland* carried out an odour assessment and concluded that '*with considered abatement protocols implemented, no odour impact should be registered by residents living in the vicinity of the facility*'. It is noted that Condition 6.11.2 of the PD requires measures for the adequate control of odour emissions.

A buffer zone has been incorporated in the design as highlighted in Figure 2.1 Proposed Site Layout Plan of the EIS.