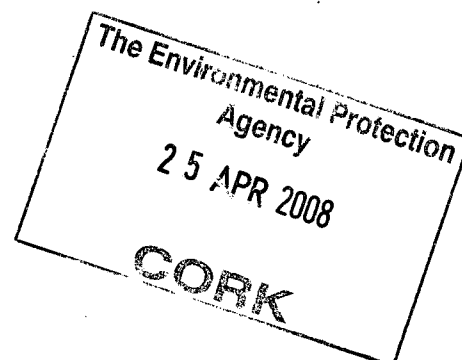


Ms. Marie O'Connor
Senior Inspector
Office of Environmental Enforcement
Environmental Protection Agency
Regional Inspectorate
Inniscarra
Co. Cork



c.c. Siobhan Mc Donnell, Inspector, OEE

8th February 2008

Ref: WL20

Dear Ms. O'Connor,

Re: Technical Amendment

Veolia Environmental Services Ltd has been advised by our Inspector to seek guidance from you in respect of an air vent at our Limerick depot, for possible inclusion on our waste licence, W0082-2. (your reference W0082-02/GC05McD.doc) The air duct is used to vent hot air from the polydensifier machines.

These machines are used to reduce the volume of expanded polymer material so that they can be sent for recycling. They are in operation for more than two years and prior to their installation and commissioning, communication was made with the Agency, notifying the Agency of our plans and seeking guidance on the matter. No response or advice was forthcoming from the Agency and we proceeded with the installation in all good faith.

During previous routine audits and inspections by the Agency, Inspectors from the OEE have commented favorably on the impact of this process and recognized the contribution that it provides to our recovery and recycling figures. This innovative contribution to waste recovery has also been recognized by IBEC when VES were awarded the Environmental Excellence Award in 2006.

This process was developed in response to the difficulties in finding disposal routes for this material to landfill. The nature of the materials is such that when it is compacted and the pressure is subsequently released it will spring back almost completely to its original form. This creates difficulties for landfills in trying to compact the materials. Furthermore, the light nature of the material causes a wind-

blow litter problem and moreover, it utilizes significant void space. In addition, it reduces the potential weights in transfer vehicles bringing waste to landfill by approximately a third thus increasing the number of articulated vehicle movements to landfill by a third and thus resulting in increased vehicular emission.

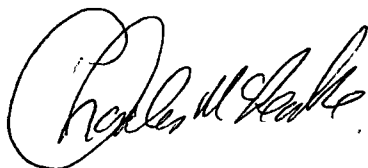
One of VES's customers in Limerick (a major electronic manufacturer) produces over 1,000 tonnes of this material per annum in its waste stream. To illustrate the volume to weight ratio of the material, VES weighed a 40ft container packed with expanded polymer and found it to weigh only 1 tonne. An equivalent 40ft container full of general waste will weigh ca 18tonnes. It is estimated that if all 1,000tonnes are landfilled; then it could displace as much as 22,000m³ of landfill void space. Since being removed from the waste stream for disposal the tonnages in the transfer trailers have increased from c.13 tonnes to 19 tonnes.

Ms. Siobhan Mc Donnell, Inspector, OEE, has issued the company with instructions to cease using this equipment as it not provided for in the licence. If VES are to immediately cease operations with this piece of machinery we contend that there would be comparable negative environmental impacts from the alternative option. These include:

- Increase in the number of vehicular movements to landfill (assumption that Veolia can identify a Landfill which will accept this material) .
- Increase in the quantity of emissions from the vehicles bringing this material to landfill.
- Increase in the amount of fuel used to bring the material to landfill.
- Decreasing the available void space at landfill.
- Disposal of a material that can be recovered and reused in the plastic recycling industry.
- Landfills will no longer accept the material.

We would welcome your swift response as to how this air duct, if so required, may be accommodated on our current licence and look forward to hearing from.

Yours sincerely,



Charles Mc Peake
Environment Manager