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Environmental Protection
Agency
22 OCT 2008

21st October 2008

Re: Re-activation of License No. W0079-01

Dear Dr. Derham,

I refer to my recent telephoned query in relation to the above licensed site during which I indicated a Greenstar proposal to re-commence waste activities. I confirm that there will be a shift in focus from C&I/C&D waste processing to primarily ferrous metal processing, an activity already licensed under W0079-01.

For your information I attach a letter that has been forwarded to Niall Horgan of the OEE, Regional Inspectorate, Dublin.

Yours Sincerely,

Malcolm Dowling
Group Compliance and Environment Manager
Greenstar

Registered in Ireland No. 325120

Directors: G. Bailey, J. Dempsey, N. Parkinson,
E. Bolger (Secretary).
Registered Office: Burton Court, Burton Hall Road,
Sandyford, Dublin 18.

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

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Mr Niall Horgan
Inspector,
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21st October 2008

Re: Re-commencement of Waste Activities at No. W0079-01 – Cookstown Industrial Estate, Tallaght

Dear Mr Horgan,

I refer to our recent discussions concerning the above licensed site. As you are aware Greenstar ceased day to day operations at the facility in April 2006 and waste activities were moved to newer licensed facilities at Greenogue and to a lesser extent Millennium Park (Licence No's. W0188-01 and W0183-01). The facility was decommissioned, but Greenstar continued to carry out the environmental monitoring programme in 2007.

It was the intention to surrender the Waste Licence, as the Greenogue and Millennium Business Park facilities provided more than enough capacity to treat the waste types that had been accepted at the Tallaght Depot. However Greenstar has now identified a market opportunity in the area of metal recovery and treatment and intends to restart waste activities at the facility on 3rd November 2008.

Prior to the cessation of waste activities the facility processed commercial/industrial non hazardous waste (C&I) and construction and demolition (C&D) waste. As described in Section H of the licence, the facility is permitted to accept up to 145,000 tonnes of waste per annum, broken down into 43,500 tonnes per annum of C&I waste (30%) and over 100,000 tonnes of C&D waste.

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~~The following classes of activity are covered by the existing licence;~~

Third Schedule – Waste Disposal Activities	Fourth Schedule – Waste Recovery Activities
13. Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced	3. Recycling or reclamation of metals and metal compounds
	4. Recycling or reclamation of other inorganic compounds
	13. Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced.

The principal activity originally carried out was Class 13 of the Third Schedule. The proposed waste activities will result in a change in the principal activity to Class 3 of the Fourth Schedule, the recycling and reclamation of metals and metal compounds.

Quantity and Type of Material

The metals will be sourced from construction and demolition sites, specialist industries that handle metal and existing waste recovery facilities. End of life vehicles (ELV) will also be accepted. We anticipate that up to 50,000 tonnes of material per annum will be accepted annually. An estimated breakdown is provided as follows;

EWC Code	Type of Material	Approximate Annual Tonnage
12 01 01, 15 01 04, 17, 04 05, 17 04 07, 19 10 01, 19 12 02, 20 01 40	Ferrous Metal (all types)	30,000
16 02 14	Discarded equipment (wastes from electrical and electronic equipment)	3,500
12 01 03, 17 04 11, 17 04 01, 17 04 02, 17 04 03, 17 04 04, 17 04 06, 19 12 03	Non-Ferrous Metals (all types)	1,000
16 01 04 – (and after de-pollution, 16 01 06)	Discarded vehicles and end-of-life vehicles	3,000
16 08 01	Spent Catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum	3
15 01 03	Wooden Pallets used to transport some metal loads	10
16-01-20	Glass-waste (ELV)	2,000

In addition to the above, there is expected to be small amounts of oils (residual fuel, lubricants, and brake fluid) antifreeze; batteries and tyres contained in the ELVs. These materials will not be accepted separately or processed on the site and will be regularly collected by an authorised collector. The following waste codes fall into this category;

EWC Code	Type of Material	Anticipated Maximum Annual Amount
13 07 03, 13 02 06	Waste of liquid fuels, synthetic engine, gear, lubricating oils	2000 litres
16 06 01	Lead batteries	300 tonnes
16 01 03	End-of-life tyres	

Waste Processes

Ferrous Metals

All incoming waste will be weighed at the weighbridge and then tipped in an enclosed storage area. Prior to tipping loads are subject to waste acceptance and inspection procedures. All contaminant material will be removed and stored in a dedicated quarantine storage area prior to removal to a suitable licensed facility. The incoming metal will be graded according to size before processing. The main process will involve hydraulic shearing of material to a manageable size suitable for metal recovery. The sheared material is essentially a product for reuse in the metals industry and is stored on-site pending loading and transfer to a processor. Material loading and unloading will be by forklift/crane.

Non-ferrous Metals

All incoming non-ferrous metal loads will be subject to the waste acceptance and inspection procedures prior to treatment. The material will be subject to a selection or separation process, prior to baling. It is expected that the majority of incoming material will be pre-sorted to a certain degree to reflect different commercial values associated with different material. The material will be sorted by size. Larger pieces, unsuitable for the smaller non-ferrous baler, will be cut by yard operators prior to baling. Once baled, these smaller bales of non-ferrous material are stored in secure containers, prior to transfer. Oversized pieces may also be cut to ensure suitability for baling with the large bailer. If unsuitable for baling, pieces are stored separately prior to removal off-site.

ELV and Waste Vehicle Process Stream

All incoming ELVs and Waste Vehicles will be subject to the waste acceptance and inspection procedures prior to treatment. Short-term storage may be required prior to de-polluting. The storage period should not exceed 1 week and storage will be in accordance with the Waste Management (End of Life Vehicles) Regulations 2006 (S.I. No.282 of 2006).

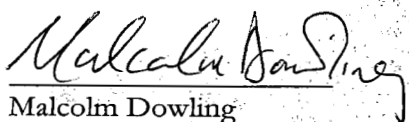
During the de-polluting process all tyres, batteries, liquids, fluids and oils, oil filters will be removed and stored separately, and the air bags neutralised (taking into account Provisions of Article 14 and 15 of the Waste Management (End of Life Vehicles) Regulations 2006 (S.I. No.282 of 2006). After de-pollution the ELVs will be baled and stored prior to onward transport and submission to recovery at an authorised facility.

Environmental Emissions

The metal processing will not result in any new emissions or require the provision of additional infrastructure, with the exception of a stand alone de-pollution unit. It is considered that the environmental impacts of the metal processing will be significantly less than those associated with previous waste activities at the facility, which involved the treatment and onward transfer of up to 145,000 tonnes of commercial and industrial wastes and construction and demolition wastes.

The metals are essentially inert and will not be a cause of odour or dust nuisance, or attract vermin. All vehicle de-pollution will be carried out internally, which will minimise the impacts associated with noise and dust. The activities will not generate a trade effluent or contaminated surface water run-off. Processed metals awaiting consignment from the site will be stored externally. Greenstar will implement the monitoring programme specified in the Licence at the start of waste activities.

Yours Sincerely,


Malcolm Dowling
Group Compliance and Environment Manager
Greenstar

c.c. Dr Jonathon Derham, Senior Inspector, EPA, Johnstown Castle, Wexford.