



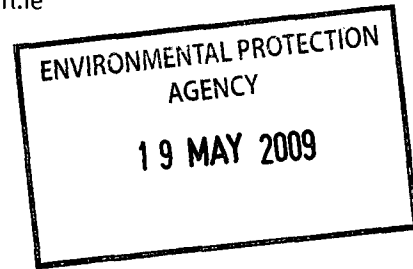
ADVANCED ENVIRONMENTAL SOLUTIONS (IRELAND) LTD.

UNIT 1, MONREAD COMMERCIAL PARK, MONREAD ROAD,
NAAS, CO. KILDARE.

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Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
County Wexford.



14th May 2009

Re: Objections to Proposed Waste Licence W0240-01

Dear Sir/Madam,

We are writing in response to the notification of the Agency's proposed decision on the waste licence application in respect of Advanced Environmental Solutions (Ireland) Ltd., Springfort Cross, Nenagh, Co. Tipperary. In accordance with Section 42 of the Waste Management Acts, 1996 to 2008, please find enclosed objections by AES (Ireland) Ltd. to the proposed decision.

In accordance with Article 44 of the Waste Management (Licensing) Regulations S.I. No. 395 of 2004, please find enclosed a payment in the sum of €500.00 made payable to the Environmental Protection Agency. If you require further information, please do not hesitate to contact me.

Yours sincerely,

Garrett Leech

Environmental Manager

Bord na Mona Resource Recovery



**OBJECTION TO THE PROPOSED DECISION
ISSUED IN RESPECT OF THE
WASTE LICENCE APPLICATION
FOR THE ADVANCED ENVIRONMENTAL SOLUTIONS (IRELAND) LTD
FACILITY AT NENAGH CO. TIPPERARY
(WASTE LICENCE REGISTER NO. 240-1)**

15th May 2009

1.0 INTRODUCTION

This objection is made by AES (Ireland) Ltd., the applicant, and addresses separately each condition of the Proposed Decision to which the objection relates. In a number of instances the purpose of the objection is to provide for clarification of the Condition.

As set out below the condition or schedule to which the objection relates is stated. The grounds of the objection are stated in full including the reasons, considerations and arguments on which they are based.

2.0 CONDITIONS TO WHICH OBJECTION RELATES

Condition

1.7.3 The facility shall not operate or accept/dispatch waste on Sundays or on Public Holidays without the agreement of the Agency.

Grounds for the Objection

We would like to object to the closure of the facility on Public Holidays. This condition will have impacts on the flexibility of acceptance of waste at the facility on Public Holidays. For instance should Christmas day fall on a Monday, there would be 3 days where the Facility was unable to accept waste. This may be an issue for balancing waste collection etc.

Condition

3.18.1 The licensee shall provide and maintain a weighbridge and wheel cleaners at the facility.

Grounds for the Objection

A weighbridge is provided on-site. However, we would like to object to the requirement for wheel cleaners. Regular inspections of all waste vehicles will take place. In the event of waste being identified on vehicles tyres/wheels, vehicles will be directed to the bin washing area - all washings will be contained and disposed of appropriately. The site will be swept on a regular basis to ensure that no waste material is allowed on the public highway.

Condition

3.24.1.2 Unless otherwise agreed by the Agency, all buildings processing putrescible waste shall be maintained at negative air pressure with ventilated gases being subject to treatment as specified by the Agency.

Grounds for the Objection

We would like to object to the requirement for negative air pressure to be maintained in the waste transfer building with ventilated gases being subject to treatment. AES Nenagh currently collects brown bin waste on a Pilot Scheme Basis. It is proposed that this collection will be extended to all AES Nenagh households within the coming months. The contents of the collected brown bins are transferred to an ejector trailer, the trailers are taken to an appropriate composting facility as soon as is possible. This process does not generate odours at/around the site, nor has the site ever received any complaints in this regard. If this activity is considered by the Agency as *processing putrescible waste*, AES considers this requirement unfair and unnecessary.