

Mr. Frank Clinton
Programme Manager,
Office of Climate Licensing and Resource Use
Environmental Protection Agency,
P.O. Box 3000,
Johnstown Caste Estate,
County Wexford.

Unit 6, Ballyogan Business Park, Ballyogan Road, Sandyford, Dublin 18. Tel: + 353 1 294 7900 Fax: + 353 1 294 7990 Email: info@greenstar.ie

18th February 2009

## RE: Waste Acceptance and Operational Hours – Greenstar Recycling (Munster) Limited - Waste Licence No. W0136-02

Dear Mr. Clinton,

Greenstar Recycling (Munster) Limited was granted a revised Waste Licence for the above referenced facility at Sarsfieldcourt Industrial Estate, Glanmire, County Cork in May 2004.

Greenstar is now seeking to amend certain conditions within this Licence relating to permitted hours of waste acceptance and operations at the site. With this in mind I have contacted Siobhan McDonnell (Inspector for this site) who has formally advised that I seek clarification from you that such a change can be facilitated through a technical amendment to the existing Licence (W0136-02).

I have outlined the background to this request below and would be most obliged if you could give the matter your attention.

## **Existing Conditions**

Conditions 1.10.1, 1.10.2 and 1.10.3 of the Waste Licence set the following Waste Acceptance Hours and Hours of Operation: -

- 1.10.1 Waste shall be accepted at the facility only between the hours of 8.00am to 6.00pm Monday to Friday inclusive and 8.00pm to 2.00pm on Saturdays.
- 1.10.2 The facility shall be operated only during the hours of 7:00am to 8:00pm Monday to Friday inclusive and 7.00am to 3.00pm on Saturdays.
- 1.10.3 The facility shall not be operated and waste shall not be accepted at the facility on Sundays or on Bank Holidays.

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 HPA Export 26-07-2013:13:56:46 Requested Amendment

Greenstar now seek the agreement of the Agency to alter the restrictive periods of waste acceptance and particularly hours of operation described above through the granting of a technical amendment permitting Greenstar to operate at the facility on a 24 hour/7 day per week basis if necessary.

**Basis for Request** 

As currently conditioned, Greenstar operates at a commercial disadvantage when compared to its competitors, some of whom are permitted to operate for significantly longer daily periods than those conditioned in WL0136-02.

Supporting Information

In the context of the site location, there are no significant environmental reasons for restricting the hours of operation.

The facility is located in an industrial estate approximately 8km northeast of Cork City and 5km north of Glanmire in the townland of Sarsfieldcourt. This industrial estate has a mixture of industrial and commercial properties and the predominant surrounding land use in the vicinity of the estate is agricultural pasture land.

The Licence allows Greenstar to accept and process 99,017 tonnes of waste per annum, comprising commercial/industrial non-hazardous waste, household waste, source separated biodegradable waste for composting and construction and demolition wastes. All waste processing takes place inside the waste transfer building, as specified in Condition 5.1 of the Licence.

Greenstar implements the comprehensive environmental monitoring programme specified in the Licence to assess the significance of emissions from site activities. The programme includes surface water, wastewater, groundwater, noise and dust monitoring. In general, limits specified in the licence have not been exceeded during the monitoring to date. Greenstar has introduced an Environmental Management System (EMS) and operates in compliance with ISO 14001. Greenstar has installed an air abatement system in the MRF building which is designed to control dust and odour emissions from the facility and this has been working successfully since June 2006.

Given the location of the facility, the nature of the licensed waste operations (in door waste handling) and the mitigation measures that are in place at the facility, it is considered that there are no sound environmental reasons for limiting the hours and days of waste acceptance and handling. Greenstar therefore requests that Condition 1.10.2 is amended by means of a technical amendment, under the provisions of Section 42 B 1(c) of the Waste Managements Acts 1993 & 2005 to allow for the handling of waste 24 hours/7days a week inside the waste transfer building.

Greenstar also seeks agreement from the Agency in accordance with Conditions 1.10.1 and 1.10.3 to allow for waste acceptance, handling and dispatch 24 hours/7days a week.

## **Summary**

Greenstar is proposing a modest and environmentally insignificant change to existing operations at the site. This flexibility is required to allow us to be more competitive particularly given the current economic climate. Given the nature of this request for a technical amendment, we would appreciate you giving the matter the earliest possible consideration. Should you have any queries on the above, please do not hesitate in contacting me.

Yours sincerely,

Malcolm Dowling

Group Compliance and Environment Manager

EPA Export 26-07-2013:13:56:40