

W0191-02
Applicant Submissions

Ann Kehoe

From: Brian Meaney
Sent: 17 July 2009 15:49
To: Ann Kehoe
Subject: FW: License Review Notices Issed for License W0191-01 Holmestown Waste Management Facility
Attachments: 2009-07-17 BG Comments - License for Holmestown WMF.doc.pdf

From: Brian Galvin [mailto:Brian.Galvin@wexfordcoco.ie]
Sent: 17 July 2009 15:38
To: Brian Meaney
Cc: Tadhg O'Corcora; Daniel McCartan; Niall McGuigan
Subject: License Review Notices Issed for License W0191-01 Holmestown Waste Management Facility

**ATTN – MR BRIAN MEANEY,
EPA
SENIOR SCIENTIFIC OFFICER
ENVIRONMENTAL LICENSING PROGRAMME**

Brian,

Attached are Wexford County Council's comments with respect to the above.

The original will follow by post.

Thanks,

Brian Galvin - Senior Engineer
Wexford County Council
Environment Section,
County Hall, Wexford.

Phone - 053-9176311
Email - brian.galvin@wexfordcoco.ie

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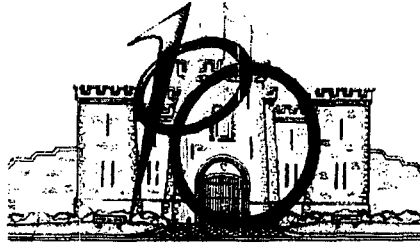
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Rialtas Áitiúil
Local Government

EPA,
Headquarters,
PO Box 3000,
Johnston Castle Estate,
Co Wexford.

ATTN: Mr. Brian Meaney

17th July, 2009

RE: EPA Notice issued under Section 42(1)(b) Waste
Management Act

License review - W0191-01 – Holmestown Waste
Management Facility

Dear Mr. Meaney,

I refer to the above notice issued to Wexford County Council dated
18th June 2009 and wish to comment as detailed below:

1. It is our view that in considering any amendments to the above waste license that the EPA should consult with the licensee through its Facility Manager at the Holmestown Waste Management Facility (WMF). WCC consider that practitioners may be able to offer assistance in developing best environmental and economic options to attaining the objectives of the review.
2. The above report does not address the issue of treatment capacity for the organic fraction on a national or regional basis. The implementation of a separate organics collection for population centers >1,500 is dependent on having available treatment capacity. It will not be possible to roll out a 3 bin system if sufficient outlets for the organic material do not exist in the region.
3. The review should allow WCC as landfill operator adequate time to implement change. Changes to landfill licenses may

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affect waste collectors and processors, and may involve planning / EIS / DAFF licensing and regulation.

4. Wexford County Council supports the principle of separation at source for BMW in population catchments >1,500 as the 1st step in reducing the amount of organics going to landfill. If this approach is to be effective – it will need to be reinforced by legislation and advertising campaigns and be incentivised at a national level so that it's effective in terms of achieving good participation rates in urban areas.
5. Please clarify the pre-treatment requirements for the SE region given its significant rural population outside of population centres >1,500. What can reasonably be expected in terms of participation rates and the affordability in the current economic climate.
6. Please clarify what, if any, criteria or procedures for validation of pre-treatment criteria will apply to the Holmestown WMF. What form will these criteria take and who will undertake same.
7. It is important that any new license requirements enable landfill operators to provide an affordable service to customers.

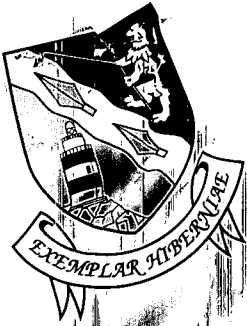
Should you require any further information, please contact me at 053-9176311 or Mr Dan McCartan at the Holmestown WMF (053-9120871).

Yours sincerely,



Brian Galvin,
Senior Engineer,
Environment Section.

20 JUL 2009



EPA,
Headquarters,
PO Box 3000,
Johnston Castle Estate,
Co Wexford.

ATTN: Mr. Brian Meaney

17th July, 2009

RE: EPA Notice issued under Section 42(1)(b) Waste
Management Act
License review - W0191-01 - Holmestown Waste
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Dear Mr. Meaney,

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1. It is our view that in considering any amendments to the above waste license that the EPA should consult with the licensee through its Facility Manager at the Holmestown Waste Management Facility (WMF). WCC consider that practitioners may be able to offer assistance in developing best environmental and economic options attaining the objectives of the review.
2. The above report does not address the issue of capacity for the organic fraction on a national basis. The implementation of a separate org for population centers >1,500 is dependent on available treatment capacity. It will not be a 3 bin system if sufficient outlets for the org not exist in the region.
3. The review should allow WCC as landfill time to implement change. Changes to

Comhairle Chontae
Loch Garman
Wexford County Council
County Hall
Wexford
Tel 053 9176500
Fax 053 9123406
email postmaster@wexfordcoco.ie

6. Please call
validation of
Holmestown
who will undertake

7. It is important that
landfill operators to provide
customers.

Should you require any further information,
053-9176311 or Mr Dan McCartan at the
(120871).

Yours sincerely,

Engineer,
Management Section.

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