

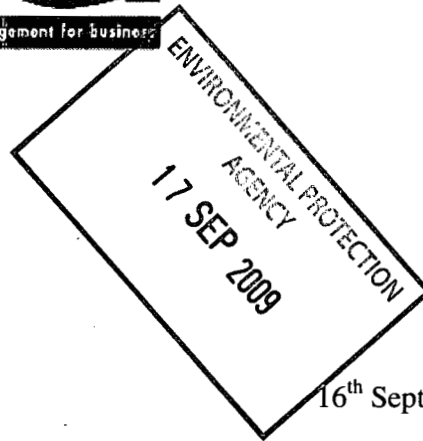
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Dr. Thomas McLoughlin,
Senior Inspector,
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
Headquarters P.O. Box 3000,
Johnstown Castle Estate,
County Wexford



16th September 2009

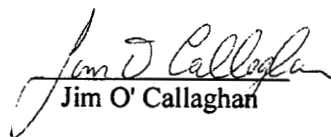
RE: Application for Waste Licence Ref. No.W0270-01 Milltown Composting Systems Ltd.

Dear Dr. McLoughlin,

On behalf of Milltown Composting Systems Ltd, I enclose one original and one hard copy of the responses to the Notice issued under Article 14 (2)(b)(ii) of the Waste Management (Licensing) Regulations on the 30th July 2009 in relation to the above referenced application. I also enclose 2 electronic copies on a CD-ROM in searchable PDF format. The content of the electronic files is a true copy of the original.

If you have any queries, please call me.

Yours sincerely,


Jim O' Callaghan

0916001/JOC/MW/MS

Encl

CC: Mr. David Ronan, Milltown Composting Systems Ltd.

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Article 14(2)(b)(ii) Further Information
Particulars and Evidence For
Miltown Composting Systems Ltd.
Waste Licence Application No. W0270-01

Article 12 Compliance

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Prepared For: -

Miltown Composting Systems Ltd.,
Miltownmore,
Fethard,
County Tipperary.

Prepared By: -

O' Callaghan Moran & Associates,
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16th September 2009

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TABLE OF CONTENTS

	<u>PAGE</u>
1. INTRODUCTION.....	1
2. ARTICLE 12 COMPLIANCE REQUIREMENTS.....	2

ATTACHMENT 1

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1. INTRODUCTION

This document presents the response by Miltown Composting Systems Ltd. (Miltown), Miltownmore, Fethard, County Tipperary to the Agency's Notice issued under Article 14(2)(b)(ii) of the Waste Management Licensing Regulations on the 30th July 2009, in relation to the application for a Waste Licence, Application Register No.W0270-01, for an organic waste composting facility at Miltownmore, Fethard, County Tipperary.

Section 2 contains the responses to the Agency's requests. For ease of interpretation each of the requests are presented in italics followed by Miltown's response. The information requested did not require an alteration to the existing non-technical summary.

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2. ARTICLE 12 COMPLIANCE REQUIREMENTS

1. *Table B7 – you mention that you propose to take in 10,000 tonnes per annum of MSW fines. Estimate how much of these fines will go for landfill for disposal? Should you not have applied for a Disposal activity in accordance with the Third Schedule?*

The MSW fines processing includes screening and composting to achieve the stabilised biowaste criteria set in the Waste Permit. The end product is not suitable for horticultural or agricultural use, and is sent to landfill. However, it is not disposed of at the landfill but is used as landfill cover, which is deemed to be a recovery activity.

The screenings removed from the incoming MSW fines are either used as bulking agents in the compost process or are sent to landfill. It is estimated that approximately 10-12% of the fines materials (screenings) are currently sent for disposal. This represents approximately 5% of the proposed overall waste inputs. Milltown Composting is currently investigating potential alternative recovery outlets for this material (plastic/paper/cardboard), for example use as a fuel in cement kilns, with the objective of reducing to a minimum the amount sent for disposal.

Given the facility has been designed and is operated for the sole purpose of waste recovery, and the very small percentage of the materials that are disposed off, Milltown considers that the facility is not a disposal activity.

2. *Section G.1 – Provide information on the amount and source of water usage at the facility.*

Water for sanitary use and in the vehicle power washer is obtained from roof water run-off from Shed 1 which is collected in an above ground tank located at south western end of the building. This tank is topped up as required using water from an on-site well. The composting process does not require water. The volume of water use at the site is approximately 102m³/year.

3. *Attachment L.2A – Offences and Convictions – Provide more information on the September 2008 District Court Case which was taken by the Local Authority under the Waste Management Act. Provide a copy of the court transcripts, if available.*

Further information on the court case is enclosed in Attachment 1. Court transcripts are not available.

4. *Provide details regarding Storm water management on site.*

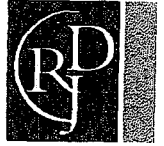
Rainfall on the undeveloped northern part of the site infiltrates to the soil. Roof water from Shed 1 is collected in an above ground storage tank, located to the rear of the building and is used for sanitary water. Roof water from Sheds 2 and 3 and run off from concrete yards surrounding the empty cattle sheds is piped to a surface water drain that runs along the western site boundary. Roof water from Shed 1 is collected in a storage tank and used in the on-site toilets.

At the time of the licence application, rainwater run-off from the paved open yards in the operational area was collected in drains and directed to a wetland area via a silt trap. Clean run-off from the building roofs was also directed to the wetlands. The overflow from the wetlands discharges to the drain at the south west site boundary.

An oil interceptor has since been installed in the yard drainage system and the yard run-off diverted away from the wetlands to discharge directly to the open drain via the interceptor. The wetlands have been retained as a wetland habitat, fed by the clean roof water. The drainage system is shown on the enclosed Figure 3.2.

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RONAN DALY JERMYN
SOLICITORS

15 September 2009

Our Ref:
FMCC/HD/34164

Your Ref:

**Re: David Ronan
District Court Case – September 2008**

Dear Jim

I refer to our telephone discussions and the recent request by the EPA in relation to the Milltown Composting Waste License Application for more information on the September 2008 District Court case.

I confirm that we appeared for Mr. Ronan at the hearing and that there is no court transcript of the case. Both David Ronan and Milltown Composting pleaded guilty to the respective charge against them.

At the hearing the prosecution set out the circumstances of the case against David Ronan. The judge then heard the plea in mitigation. Counsel for Mr. Ronan explained to the Court that Mr. Ronan immediately engaged personnel to investigate all possible mitigation measures and separate contractors to carry out the agreed work schedule in full cooperation with the local authority. He explained that Mr. Jerome Keohane of GES Limited (BSC in Geology from UCC, a masters in geophysics from UCG, a chartered geologist and member of the Institute of Engineers of Ireland) played an important role in guiding the investigation of the aquifer and deciding what testing should be done under ground. He was engaged to undertake a hydrogeological assessment for submission to the local authority. Mr. David Drew of UCD was also engaged to conduct a tracer study of the Colman Sink inflow. This study showed that the conduit from Colman Sink exits via a number of springs directly into the river. He stated that from their report it was concluded that this conduit acted like a pipe work system diverting the material which enters the Colman Sink directly into the river and that there was no indication that the material had any lasting effecting on the river. He explained that the land spreading activity was undertaken on agricultural lands which overlie a poor aquifer.

He explained that unfortunately the land spreading took place in reliance on the incorrect dates that were published in error in the Farmer's Journal for land spreading in circumstances where Mr. Ronan had a nutrient management plan in place in respect of his other activities on this land. The incident was the result of an unprecedented rain fall event generating run off from the spread lands which washed off some of the organic material applied. He also explained that Mr. Ronan had done everything that possibly could be done to mitigate the situation.

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ATTACHMENT 1

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