



Rialtas Áitiúil  
Local Government

16 November 2009

Mr. Brian Meaney,  
EPA Headquarters,  
P.O. Box 3000,  
Johnstown Castle Estate,  
**Co. Wexford.**

Environmental Protection Agency
Licensing
Received
16 NOV 2009
Initials _____

**Re: EPA Licence Review WO191/02  
Holmestown Waste Management Facility Proposed Decision**

**By Hand – 16 November, 2009**

Comhairle Chontae  
Loch Garman

Wexford County Council  
County Hall  
Wexford

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Dear Mr. Meaney,

I refer to the Agency's proposed decision on a waste licence review for the above facility.

Wexford County Council, as the licensee, wishes to object to the proposed decision, as detailed below, and attaches a cheque for €500.00 as required.

The Council objects to the following conditions giving reasons for same following consideration of the issues involved. The Council would welcome the opportunity to discuss any aspect of this objection with the Agency.

**Subject Matter for the Objections:**

**Condition 5.2.9**

The licensee considers this condition excessive. It is proposed that a log of waste that does not meet the acceptance criteria would be maintained at the facility which will be available for inspection. A summary of the log could be included in the AER.

**Condition 5.18**

- (a) The proposed decision sets maximum targets of 40%, 24% and 15% by weight for BMW going to landfill.

The basis for the 40%, 24% and 15% targets is given as the EPA Technical Guidance document MSW – Pre Treatment and Residuals Management. This document identifies specific minimum acceptable pre-treatment criteria for rural and urban areas – 2 bin collection is rural areas with 3 bin (separate collection of bio waste) in population

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centres >1,500. The document states that nationally the required targets can be met for 2010 and 2013 using the above criteria.

The Joint Waste Management Plan for the South East Region also identifies a 3 bin collection system requirement for urban areas as part of an overall strategy for management of waste within the region. The plan proposes an integrated approach to deal with residual waste for 2 and 3 bin collection areas combining the diversion of bio waste for bio stabilisation or composting and the development of waste to energy for the remainder of the residuals.

If the % BMW arisings from 1, 2 and 3 bin collection systems, as detailed in the EPA's Municipal Waste Characterisation Campaign 2008 are accurate – its difficult to see how the 2010 and 2013 target levels will be achievable for landfills serving largely rural areas.

There is no available facility within the region with which the licensee could adopt an arrangement as provided for in Condition 5.18.2.

The Agency, in making its decision and in setting targets for the Holmestown facility should have specific regard to:

- the adopted Joint Waste Management Plan for the South East Region;
- EPA Technical Guidance document MSW – Pre Treatment and Residuals Management;
- the rural character of area served;
- the proximity principle.

Wexford County Council submit that the implementation of a 2 bin collection system throughout the County, and a 3 bin collection in urban area with populations >1,500, as per the EPA's Technical Guidance document, should be considered as satisfying the BMW targets in this licence.

- (b) There are currently insufficient outlets for treatment of bio waste to meet the bio stabilised residual waste/compost standards as set in the licence within the South East region. In considering the licence the Agency should have regard to availability of treatment within the region.

#### **Condition 6.9**

It is noted in the Inspector's Report and appended documents that additional odour management conditions have been inserted in particular licences in response to significant odour complaints/problems at these sites. In our view, the facility at Holmestown does not fall into this category.

The EPA has undertaken a number of site audits and inspection at Holmestown to date and no significant odour problem has been identified by the Agency to the licensee. To our knowledge only one complaint

relating to odour has been received by the Agency since the facility went into operation in April 2008.

The Council makes every effort to manage odour issues on site and has been successful in its efforts to date. In our view there is no basis for the inclusion of condition 6.9 relating to odour in the licence based on the premise that the site has significant odour complaints/problems. It is our view that this condition is not required and should be omitted.

**Condition 11.8**

Clarify if waste characterisation is required from 01 January, 2010 or 01 July, 2010.

**Condition 12.2.1 and 12.2.3**

It is not clear what should be included in the AER in relation to measures and associated costs for the prevention of environmental damage. The nature and scope of environmental damage should be defined prior to inclusion of these conditions.

**Condition D12**

See condition 6.9 above.

Yours sincerely,



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