

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

16th November 2009

Re: Objections to Proposed Waste Licence W0201-03

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 Bord na Móna Plc., Drehid Waste Management Facility, Killinagh Upper, Carbury, Co. Kildare. In accordance with Section 42 of the Waste Management Acts, 1996 to 2008, please find enclosed objections by the Drehid Waste Management Facility 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

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**OBJECTION TO THE PROPOSED DECISION
ISSUED IN RESPECT OF THE
WASTE LICENCE APPLICATION
FOR THE DREHID WASTE MANAGEMENT FACILITY
(WASTE LICENCE REGISTER NO. 201-03)**

16th November 2009

1.0 INTRODUCTION

This objection is made by the Drehid Waste Management Facility, 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

2.2.2.3 Landfill Environmental Management Programme (EMP)

Within 12 months from the date of grant of this licence, the licensee shall prepare and maintain a LEMP, including a time schedule for achieving the Environmental Objectives and Targets prepared under Condition 2.2.2.2. The LEMP shall have regard to the guidance set out in the EPA Manual on *Landfill Operational Practices*. The LEMP shall replace any existing EMP and shall include:

- designation of responsibility for targets;
- the means by which they may be achieved; and
- the time within which they may be achieved.

The LEMP shall be reviewed annually and take into account operational experiences at the facility, the stage of development of the facility (active, closure, aftercare), evolving legislative and BAT requirements, as well as any Agency instructions that may issue. Amendments shall be notified to the Agency for agreement as part of the Annual Environmental Report (AER).

A report on the programme, including the success in meeting agreed targets, shall be prepared and submitted to the Agency as part of the AER. Such reports shall be retained on-site for a period of not less than seven years and shall be available for inspection by authorised persons of the Agency.

Grounds for the Objection

Bord na Mona wish to point out to the Agency that the Waste Licence 201-02 does not solely relate to landfill activities and on this basis request that the original condition relating to an EMP to account for landfilling and composting activities should apply.

Condition 6 and Schedule C.5

Condition 6.1 states that:

6.1 The licensee shall ensure that:

- (i) sampling and analysis for all parameters listed in the Schedules to this licence;
- (ii) any reference measurements for the calibration of automated measurement systems; and
- (iii) any waste acceptance testing and analysis required by this licence

shall be carried out by competent laboratories in accordance with CEN-standards. If CEN standards are not available, ISO, national or international standards or alternative methods shall apply with the agreement of the Agency.

Schedule 5 details the following:

Waste Class	Frequency	Parameter	Method
Bio-stabilised residual waste	Every 200 tonnes from each source Note 1	Respiration activity after 4 days	To be agreed by the Agency
Waste sent off-site for Disposal/Recovery Note 2			

Grounds for the Objection

In relation to Schedule C.5 of the Draft licence (see above), respiratory testing is required for Bio-stabilised residual waste. Condition 6.1 requests that analysis “shall be carried out by competent laboratories in accordance with CEN-standards. If CEN standards are not available, ISO, national or international standards or alternative methods shall apply with the agreement of the Agency.”

To the best of our knowledge no Laboratory in Ireland has yet developed a standard which would satisfy this condition with respect to Bio-stabilised residual waste. Bord

na Mona is concerned that this Schedule is vague in its description of an appropriate method. The concern would be that the Agency may in the future request the analysis to be undertaken at a laboratory outside of the state or at a laboratory within the state which monopolises this analysis. These scenarios could be impractical and costly to undertake.

In relation to Schedule 5 and the frequency for testing for Bio-stabilised residual waste i.e. "Every 200 tonnes from each source" and taking Condition 8.1.4.2 from Note 1 of Schedule 5 into account, Bord na Mona considers this frequency to high and request that this be reduced. The practicalities and costs associated with sampling and analysing at this frequency in the first instance is considered over onerous.

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