

**This Report has been cleared for submission to the Board by the Programme Manager F Clinton**  
**Signed:** *[Signature]* **Date:** 10/2/10



**OFFICE OF CLIMATE,  
 LICENSING &  
 RESOURCE USE**

**REPORT OF THE TECHNICAL COMMITTEE ON  
 OBJECTIONS TO LICENCE CONDITIONS**

<b>TO:</b>	Directors
<b>FROM:</b>	Technical Committee <b>ENVIRONMENTAL    LICENSING    PROGRAMME</b>
<b>DATE:</b>	10 <sup>th</sup> February 2010
<b>RE:</b>	Objection to Proposed Decision for a waste licence review from Clare County Council, for Central Waste Management Facility, Ballyduff Beg, Inagh, County Clare. Licence Register: W0109-02

Application Details	
Class(s) of activity:	4 <sup>th</sup> Schedule: Classes 2, 3, 4, 9, 10 and 11 3 <sup>rd</sup> Schedule: Classes 2, 4, 5, 6 7, 11, 12 and 13
Location of activity:	Ballyduff Beg, Inagh, County Clare
PD issued:	19 October 2009
First party objection received:	16 November 2009 <sup>Note 1</sup>
Third Party Objection received	None
Submissions on Objections received:	None

Note 1: In accordance with Section 17(1) of the Waste Management Acts (1996 to 2008), as the final date for a valid objection was a Sunday (15<sup>th</sup> November), all valid objections received up to and including Monday 16<sup>th</sup> November were regarded as having been received before the expiration of the objection period.

**Introduction**

Clare County Council were granted an EPA waste licence on 13<sup>th</sup> June 2001 for the development of a new central waste management facility in Ballyduff Beg, Inagh, County Clare. The facility consists of an engineered lined landfill, civic waste facility, recovery/recycling facility and a composting area.

On 18 June 2009, the Environmental Protection Agency initiated a review of the waste licence relating to the landfilling activities at Clare County Council's Central Waste Management Facility, waste licence register number W0109-02. The review was initiated by writing to the licensee and placing a newspaper notice in the Irish Independent.

**Consideration of the Objection**

The Technical Committee (TC), comprising of Yvonne Furlong (Chair) and Ann Marie Donlon, has considered all of the issues raised in the Objection, and this report details the Committee's comments and recommendations following the examination of the objections

together with discussions with the sectoral technical expert, Mr. Brian Meaney, who also provided comments on the points raised.

This report considers a valid first party objection submitted by Clare County Council.

A request for an oral hearing was made and the Board considered this request at the meeting of 02/02/2010 and refused the request.

### **First Party Objection**

#### **A.1. Part I Activities Licensed**

The applicant objects to the removal of Class 2 of the Third Schedule (*'Land treatment, including biodegradation of liquid or sludge discards in soil'*) of the Waste Management Acts, 1996 to 2008, from the licensed waste disposal activities of the licence.

The applicant objects on the grounds that this activity was previously licensed and its removal reduces the services offered by Clare County Council.

The applicant also request that the list of licensed waste recovery activities be extended to include temporary storage of WEEE and the temporary storage of abandoned vehicles as per previous agreements with the Agency.

#### Technical Committee's Evaluation:

Class 2 of the Third Schedule of the Waste Management Acts, 1996 to 2008, was removed from the licence in accordance with Condition 5.13(f) of the existing licence, W0109-01. This condition states that the acceptance of sludge at the facility was to cease on the 1<sup>st</sup> July 2009. No agreements have been made between the licensee and the Office of Environmental Enforcement to continue allowing the acceptance of sludge at the facility.

With regard to the temporary storage of WEEE and abandoned vehicles, Table G.2 of the licence outlines the waste categories and quantities for recovery and disposal at the civic waste facility. The licence allows for 2,000 tonnes per annum of wastes for recycling and recovery at the waste recycling and recovery area.

<b>Recommendation:</b> No Change
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#### **A.2. Condition 1.13**

The applicant objects to this condition as they feel it limits the services offered to a number of their customers. The applicant feels that this condition limits in particular the services that can be provided to private customers who avail of the facility for the disposal of black bag waste. The applicant advises that these customers also avail of the recycling facilities at the site. Clare County Council is of the opinion that the provision of recycling facilities at the same site ensures that pre-treatment of the waste is carried out by the householder.

#### Technical Committee's Evaluation:

It is a requirement of the Landfill Directive that waste be treated prior to landfilling. If the licensee cannot demonstrate that the waste deposited by members of the public has been treated, and if there are no pre-treatment facilities at the landfill, they will have to direct untreated waste to an alternative appropriate facility. As part of the requirement for revised waste acceptance procedures (condition 5.1), the licensee will have the opportunity to demonstrate how the service offered, if it is to continue, will be operated in compliance with the conditions of the licence.

**Recommendation:** No Change

### **A.3. Condition 1.15.1**

The licensee objects to the requirements of Condition 1.15.1 as they are concerned that the limits presented are not achievable. The applicant states that their concern is based on a recent waste characterisation survey presented by the EPA, which indicates that the content of biodegradable municipal waste (BMW) in municipal solid waste (MSW) from a 3-bin system averages at 47%. The applicant states that 'it appears that the more stringent biodegradable municipal waste percentage limits are not achievable unless biostabilised residual waste is also landfilled'. Clarification is also sought on whether biostabilised residual waste utilised as daily/weekly landfill cover can be taken into account when calculating the site BMW levels as per Condition 1.15.

The licensee states that the absence of a uniformly imposed three bin system across all collectors favours those who choose not to operate such a collection.

The licensee also states that the absence of large scale biostabilisation processes in the Irish market at this stage makes the implementation of the BMW limits unreasonable and unachievable.

#### Technical Committee's Evaluation:

The EPA technical guidance document 'Municipal Solid Waste – Pre-treatment and Residuals Management 2009' which was based on 2007 statistics, stated that the maximum allowable BMW content in MSW accepted at landfill should be 40% (by weight) for 2010; 24% (by weight) for 2013; and, 15% (by weight) for 2016 and subsequent years. This guidance also stated that as further statistical data became available the EPA would update this direction to the sector, as necessary.

The TC clarifies that the limits specified in Condition 1.15.1 are based on municipal solid waste generated at a national level to ensure compliance with the landfill diversion targets. The 2008 National Waste Report reported a 5% decrease in municipal solid waste generated in 2008 compared to 2007. It is also stated in this report that 'if the data from landfill operators and the waste industry for the NWR 2009 supports this fall the EPA will, if deemed necessary, revisit the diversion obligations specified for landfill operators'. Therefore the percentage limits would increase under these circumstances. Consequently the wording of Condition 1.15.1 provides for the Agency to specify new limits as necessary following review of statistical data.

With regard to stabilised biowaste counting as biowaste when measuring achievement against the targets; if the waste put to landfill has been appropriately treated, with biowaste removed or stabilised, then it will no longer be counted as biowaste for the purposes of compliance with EU diversion and pre-treatment targets.

In relation to the comment by the licensee regarding the absence of a uniformly imposed three bin system across all collectors favouring those who choose not to operate such a collection, this is a matter for the Regional Waste Management Plan and the local granting of waste collection permits in the context of the Ministerial Circular WPPR 17/08 entitled 'National Strategy On Biodegradable Waste'-Implementation Of Segregated 'Brown Bin' Collection For Bio Waste And Home Composting, dated 31<sup>st</sup> July, 2008.

With regard to the issue of capacity to process BMW it is agreed that at present there is an infrastructural deficit, however it is considered that the initial targets as outlined in Condition 1.15.1(i) of the PD will be achieved through a combination of the three-bin initiative, diversion of biodegradables to home composting programmes, existing and pending biowaste treatment capacity, improved removal rates for paper and cardboard waste and implementation of the Waste Management (Food Waste) Regulations 2009. This will provide an opportunity, prior to the deadline for the achievement of the second target, for the sector to develop a network of treatment facilities throughout the State.

**Recommendation:** No Change.

#### **A.4. Condition 1.15.2**

Clare County Council object to this condition, as they believe they are not in a position to avail of the benefits of this condition, as they do not have a landfill available to them that they may join with.

##### Technical Committee's Evaluation:

Notwithstanding the fact that the landfill is located in a waste management planning region with two other operating landfills, this condition is not limited to landfills in the general vicinity of the licensed activity. Neither is the condition available to inert landfills who do not have a corresponding enabling condition.

**Recommendation:** No Change

#### **A.4. Condition 1.16**

Clare County Council considers that the imposition of these terms is arbitrary and unfair. They state that the use of the approved calculation factors published by the EPA for waste streams are open to abuse.

##### Technical Committee's Evaluation:

The TC wish to clarify that the calculation factors are set out in 'Protocol for the evaluation of biodegradable municipal waste sent to landfill by pre-treatment facilities'. The TC advises that this document is currently open for public consultation and any interested parties are invited to make a submission on the content and operation of the protocol up to 1 April 2010.

With regard to the comment by Clare County Council that the use of the approved calculation factors for waste streams are open to abuse, the TC highlight that the condition states that where appropriate EPA approved contractors be used for waste characterisation. The use of EPA approved contractors will *ensure* that there will be consistent and fair determination of calculation factors should the need arise, and this assurance should be regarded as equitable for all landfill operators.

**Recommendation:** No change

#### **A.5. Condition 1.17**

Clare County Council considers that this condition conflicts with the stated requirements in 'Part I Activities Licensed' in terms of the tonnages listed in Class 5.

Technical Committee's Evaluation:

Section A.1 above deals with the applicant's objection to the removal of Class 2 of the Third Schedule of the Waste Management Acts 1996 to 2008 from the licence.

In 'Part I Activities Licensed' of the licence a reason is give for each of the licensed activities. Class 5 of the Third Schedule of the Waste Management Acts 1996 to 2008 is licensed. The reason Class 5 is licensed is explained as; 'this activity is limited to the disposal of a maximum of 56,500 tonnes of non-hazardous waste, excluding sewage sludge, per annum into engineered lined cells'.

The figure 56,500 tonnes per annum is the maximum allowable waste acceptance under the existing licence, W0109-01. The existing licence (W0109-01) allows 2,700 tonnes per annum of treated industrial non-hazardous sludges be accepted at the landfill until 1<sup>st</sup> July 2009. This licence review updates the waste acceptance figures for this site by removing the allowance for accepting treated industrial non-hazardous sludges.

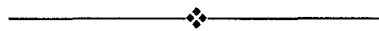
This is reflected in Schedule G of the PD, which allows for a maximum allowable waste acceptance of 53,800 tonnes per annum (56,500 – 2,700 = 53,800). This change in maximum allowable waste acceptance was not updated in 'Part I Activities Licensed' in the reason for licensing Class 5.

Then TC recommends updating 'Part I Activities Licensed' of the licence to reflect that treated industrial non-hazardous sludges can no longer be accepted at the facility.

**Recommendation:** Replace the current Class 5 below, from the table entitled 'Licensed Waste Disposal Activities, in accordance with the Third Schedule of the Waste Management Acts, 1996 to 2008' from 'Part I Activities Licensed'

**Class 5 Specially engineered landfill, including placement into lined discrete cells which are capped and isolated from one another and the environment.**

This activity is limited to the disposal of a maximum of 56,500 tonnes of non-hazardous waste, excluding sewage sludge, per annum into engineered lined cells.



**Class 5 Specially engineered landfill, including placement into lined discrete cells which are capped and isolated from one another and the environment.**

This activity is limited to the disposal of a maximum of **53,800** tonnes of non-hazardous waste, excluding sewage sludge, per annum into engineered lined cells.

**A.6. Condition 3.16**

Clare County Council objects to this condition in the context of their disagreement with the imposition of the new diversion targets. The reason for this objection is outlined in Section A.3 above. Clare County Council state that if the objection to the introduction of the diversion targets is not upheld then they consider that there is no need for Condition 3.16 until after 1 January 2011.

Technical Committee's Evaluation:

This condition relates to the reporting requirements of the diversions targets. The imposition of the diversion targets is dealt with in Section A.3 above.

With regard to the submission of quarterly summary reports to the Agency, the TC does not propose changing the dates. It is important that the landfilling of biodegradable municipal waste be monitored closely during 2010 as 1 July 2010 to 31 December 2010 is the first target period for diversion. Notwithstanding this need for close monitoring, the condition allows changes in reporting dates if advised by the Agency.

**Recommendation:** No Change

#### **A.7. Conditions 5.15.2, 5.15.3, 5.15.6 & 5.15.9**

Clare County Council requests that these conditions be modified to reflect the composting system in place at the site. With the agreement of the Agency, Clare County Council replaced the original proposed windrow system with an aerated static pile, which does not require daily turning and daily temperature measurement. At present only green waste is composted on site. The in-vessel digesters included in the original proposal have not been commissioned. In the event that they are to be brought into use in the future, the design, installation and operation of the final system will follow the details submitted to and agreed with the Agency.

#### Technical Committee's Evaluation:

In August 2004 Clare County Council submitted a specified engineering works report to the OEE outlining their proposals for the installation of a compost facility. In September 2004 the OEE issued a letter of agreement to the licensee stating that the proposed composting facility was to the satisfaction of the Agency, subject to a number of conditions, which were outlined in the letter as follows:

- 'Compliance with the EU's (i) Working Document entitled 'Biological Treatment of Biowaste, 2<sup>nd</sup> Draft' and (ii) Animal By-Products Regulations 1774/202.
- Only source separated organic waste and green waste is composted at the facility
- All waste for composting is introduced into the in-vessel composting systems where possible on the day of receipt or no later than 24 hours after its acceptance.
- No waste shall be left in the reception building from the close of operation on Saturday until Monday morning opening.
- All contaminated leachate/surface waters arising from the composting operations are either recirculated (where possible) or diverted to the condensate tank/leachate transfer tank.
- A programme from regular maintenance and monitoring of the in vessel 'digesters', curing operations and the biofilter(s) is submitted (tabulare form) to the Agency for its agreement.
- A monitoring programme of the final composted material together with outlets for such materials is agreed in advance with the Agency.
- The information requested above is submitted to the Agency by the 24<sup>th</sup> September 2004.'

The TC recommends updating the current composting condition in the PD to better reflect the current situation on site and to incorporate the agreement between the OEE and the licensee.

**Recommendation:** Replace current Condition 5.15, below

#### 5.15 Composting Area

- 5.15.1 Only source separated organic waste and green waste shall be accepted at this facility. The quantity of waste composted shall not exceed 2,000 tonnes per annum unless otherwise agreed by the Agency under Note 3 of Table G.2.

- 5.15.2 The Composting Facility shall be provided and operated in accordance with the Article 13 reply dated March 2000.
- 5.15.3 The compost windrows shall be covered with Top Tex Cover or equivalent at all times except when biodegradable waste including bulking agents are being added to the windrows, when moisture content of the windrow is being supplemented or when the compost is being mixed.
- 5.15.4 All putrescible waste accepted to the composting unit shall be introduced into the compost process or made into a windrow within 24 hours of delivery.
- 5.15.5 No waste shall be left on the reception area from the close of operation on Saturday until Monday morning opening.
- 5.15.6 A windrow turner shall be used to ensure proper turning and aeration of the windrows.
- 5.15.7 Waste shall attain a temperature of 55oC or greater for at least 15 days during the composting period. During the high temperature period, the windrow shall be turned at least five times.
- 5.15.8 The compost produced must achieve the requirements set out in *Schedule H: Compost Quality* of this licence. Records of the quantity of compost which does not meet the requirements of *Schedule H: Compost Quality*, of this licence must be maintained and submitted to the Agency on request.
- 5.15.9 The licensee shall maintain a daily written record of temperature and turning of the compost.
- 5.15.10 The entire compost area must be bunded and all drainage shall drain to the leachate lagoon.



With the following Condition 5.15,

#### 5.15 Composting Area

- 5.15.1 Only source separated organic waste and green waste shall be accepted at this facility. The quantity of waste composted shall not exceed 2,000 tonnes per annum unless otherwise agreed by the Agency under Note 3 of Table G.2.
- 5.15.2 The Composting Facility shall be provided and operated in accordance with the Specified Engineering Works report dated 30 August 2004 and in compliance with the EU's working document entitled 'Biological Treatment of Biowaste 2<sup>nd</sup> Draft' and the Animal By-Products Regulations, or alternative documents as agreed by the Agency.
- 5.15.3 All waste for composting accepted to the composting unit shall be introduced into the compost process within 24 hours of delivery.
- 5.15.4 No waste shall be left on the reception area from the close of operation on Saturday until Monday morning opening.
- 5.15.5 All contaminated leachate and surface waters arising from the composting operations shall be recirculated, where possible, or diverted to the condensate tank/leachate transfer tank.
- 5.15.6 A programme for regular maintenance and monitoring of the in-vessel 'disgesters', curing operations and the biofilters shall be submitted to the Agency for its agreement within one month of date of grant of this licence.
- 5.15.7 A monitoring programme of the final composted material together with outlets for the final composted material shall be agreed with the Agency.
- 5.15.8 The compost produced must achieve the requirements set out in *Schedule H: Compost Quality* of this licence. Records of the quantity of compost which does not meet the requirements of *Schedule H: Compost Quality*, of this licence must be maintained and submitted to the Agency on request.
- 5.15.9 The entire compost area must be bunded and all drainage shall drain to the leachate

lagoon.

#### **A.8. Condition 7.11**

Clare County Council objects to this condition in a general manner. The applicant states that it is aware that only certain landfills have had this condition imposed on them as part of the licence review. The applicant therefore feels that the imposition of this condition is arbitrary and favours landfills which do not have these conditions imposed. The applicant states that there is no evidence to suggest that this condition takes proper account of issues such as complexity of terrain, distance to receptors, facility size or numbers of odour complaints received. Clare County Council states that the imposition of this condition restricts the services that they can offer to their customers.

##### Technical Committee's Evaluation:

The OEE has identified this site as a priority site regarding odour. Approximately 41 odour complaints were received in relation to this facility between 2008 and 2009. This was reported to the Board of the Agency at PD stage.

Condition 7.11 sets out the requirements for an odour management plan. Under the scope of the plan, site-specific conditions, such as complexity of terrain, distance to receptors and facility size, can be taken into account.

**Recommendation:** No Change

#### **A.9. Condition 7.11.2(ix)**

Clare County Council object to this condition and seeks clarification whether this monitoring is to be carried out by the County Council staff or whether the biannual preparation of an independent assessment and report on surface VOC emissions is considered adequate to meet the requirement of Condition 7.11.2(ix).

##### Technical Committee's Evaluation:

The TC considers that the biannual provisions as set out in 7.11.2(iv) are not sufficient to satisfy the monitoring requirements of 7.11.2 (ix).

The TC highlight that it is a matter for the Licensee to determine how the monitoring provisions of the odour management plan shall be met having regard to the licence requirements.

**Recommendation:** No Change

#### **A.10. Condition 7.11.5**



It is not clear to the applicant whether these trigger levels are proposed for monitoring results obtained during twice annual independent odour assessment or whether this monitoring is to be carried out by County Council staff. If it is to be carried out by County Council staff clarification of the equipment and method to be used are sought. Clarification is sought on how meteorological variations will be taken in to account. Clare County Council also enquires what is the accuracy of data in the 50 ppmv range (if a PID/FID detector is used, its detection limit appears from Odour Monitoring Ireland reports to be quite close to the lower trigger level of 50 ppmv)?

Clare County Council agree that the measurement of surface VOC emissions is an effective comparative tool for assessing cap integrity, weld connections around wells, potential for gas release from active areas etc. However, they are concerned that the application of trigger level limits to the results obtained and the resultant classification of any exceedance of those limits as an incident, makes too many scientific assumptions about a methodology which may be subject to variations due to weather conditions such as atmospheric pressure, wind speed, surface temperature, humidity. Clare County Council outlines that Odour Monitoring Ireland stated in a report to them (dated 23rd January 2009) that ‘the continuous kinematic “Odour hog” with integrated GPS (is a useful technique) for comparison in leakage area within the same landfill facility on different surveys but is not for cross comparison of VOC leakage between landfills due to a number of factors including, mass flow of VOC on the day of measurement, relative odorous nature of the detected compounds within individual facilities, etc’. Clare County Council believe that this statement would appear to validate their concerns in relation to assigning fixed value limits to site VOC emissions.

Clare County Council do not believe there is adequate data available to assign these limits; they are concerned about the accuracy of data generated at the lower end of the range, given that Odour Monitoring Ireland’s instrument appears to have a detection limit of 31 ppm; they are concerned about variation in results that may occur with changes in meteorological conditions. They are also concerned about the resultant requirement to report any surface VOC exceedences as incidents.

For the reasons above Clare County Council feel this condition is inequitable and excessively onerous.

Technical Committee’s Evaluation:

The TC advises that the VOC trigger levels are based on a review of international guidance for surface emissions and that the trigger levels apply to the biannual VOC assessment (see Condition 7.11.2 (iv)) or any monitoring undertaken by the Agency. Condition 7.11.2 (iv) requires an independent assessment but makes no comment on who undertakes the monitoring. It is anticipated that the requirements of this condition will be met by a portable FID instrument or equivalent. These instruments when used properly have a detection range from 1ppm to 10<sup>5</sup>ppmv for methane, if not better. Surface emissions will be affected by weather conditions. Wet ground and rising atmospheric pressure can act as barriers to gas migration. It is important that weather conditions are recorded on the day of monitoring and form part of the assessment. Given that only biannual monitoring is required, it is expected that monitoring would be undertaken during periods of neutral weather conditions. The trigger level of 50ppmv is an average value for a number of readings over the representative area.

Trigger levels are defined in the glossary to the PD and require the licensee to take an action and in these circumstances it requires remediating measures such as repairing faults in pipework/cap or improving landfill gas management. The OEE will give further explanation to licensees on meeting the requirements by way of guidance as appropriate.

<b>Recommendation:</b> No Change
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[Empty Box]

**A.11. Condition 9.21**

Clare County Council object to this condition. They outline that health and safety requirements are a statutory requirement and should not be licence conditions.

Technical Committee's Evaluation:

The TC advises that this is a legal requirement under the Section 40(4)(h) of the Waste Management Acts 1996 to 2008. Section 40(4)(h) of the Waste Management Acts 1996 to 2008 states that the Agency shall not grant a waste licence unless it is satisfied that necessary measures will be taken to prevent accidents in the carrying on of the activity concerned and, where an accident occurs, to limit its consequences for the environment.

[Empty Box]

**Recommendation:** No Change

**A.12. Condition 11.3**

Clare County Council object to this condition as they believe the requirement to employ a consultant to carry out these functions is arbitrary and takes no account of the fact that suitably qualified staff are available in Clare County Council to carry out these tasks.

Technical Committee's Evaluation:

The TC highlight that Condition 11.3 is worded to ensure that the Environmental Liabilities Risk Assessment is *completed* by an independent and appropriately qualified consultant in order that a third-party validates the assessment, proposals and financial provisions. This will assist in ensuring that realistic planned/anticipated and unexpected risks and associated costs are considered.

This condition does not prevent the licensee from undertaking other aspects of the ELRA.

[Empty Box]

**Recommendation:** No Change

**A.13. Table E.2.1 & Table F.5**

Clare County Council received the approval of the Agency in September 2006 to discontinue monitoring for flare stack particulates, on health and safety grounds. Therefore Clare County Council request that the particulate monitoring requirements be removed from Tables E.2.1 and F.5 or that the statement "or as otherwise agreed with the Agency" be included under the parameter list.

Technical Committee's Evaluation:

The TC is satisfied that an agreement was made between the Office of Environmental Enforcement (OEE) and the Licensee to discontinue monitoring for flare stack particulates. The letter of consent from OEE stated that 'the Agency removes the requirement to undertake this monitoring (*particulate monitoring of gas flare*) until further notice.'

As the agreement between the licensee and the OEE is not for definitive cessation of particulate monitoring at the facility, the TC does not recommend removal of particulate

monitoring from the licence. Condition 9.12 of the licence allows for changes to monitoring frequencies.

**Recommendation:** No Change

#### **A.14. Table E.5.1**

Clare County Council requests that the statement 'or as otherwise agreed with the Agency' be included in this table. In addition to the locations listed, Clare County Council presently carries out surface water monitoring at SW1a, SW1 and SW12, as agreed with the Agency.

#### Technical Committee's Evaluation:

The TC advises that the scope of monitoring may be amended under the provisions of Condition 9.12.

**Recommendation:** No Change

#### **A.15. Table G.1**

Clare County Council object to this table as the values and totals are not in accordance with their previous licence limits and in particular are not in agreement with stated tonnages in 'Part I Activities Licensed' Class 5.

#### Technical Committee's Evaluation:

This is dealt with in Sections A.1 and A.5 above.

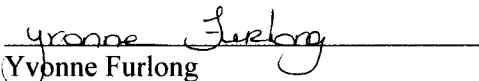
**Recommendation:** No Change

#### **Overall Recommendation**

It is recommended that the Board of the Agency grant a licence to the applicant

- (i) for the reasons outlined in the Proposed Decision and
- (ii) subject to the conditions and reasons for same in the Proposed Decision,  
and
- (iii) subject to the amendments proposed in this report.

Signed

  
Yvonne Furlong

for and on behalf of the Technical Committee