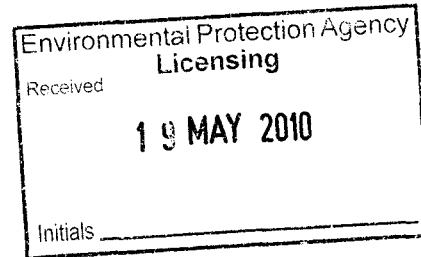


App Obj ①



TEL: 01443 271221  
FAX: 01443 271222

Ms. Ann Kehoe,  
Programme Officer,  
Office of Climate, Licensing & Resource Use,  
Environmental Protection Agency,  
Headquarters P.O. Box 3000,  
Johnstown Castle Estate,  
County Wexford



19<sup>th</sup> May 2010

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

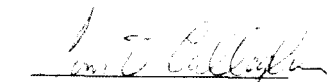
Dear Dr. McLoughlin,

On behalf of Milltown Composting Systems Ltd, Fethard, Co. Tipperary, I enclose one original and one hard copy of the grounds for objection to a number of Conditions and Schedule included in the Proposed Decision waste licence application W0270-01. The objection fee (€500.00) has been paid electronically.

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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

email: info@ocallaghannoran.com Website: www.ocallaghannoran.com

O'Callaghan Moran & Associates. Registration No. 8272844U



**Objection To**  
**Proposed Decision**  
**Waste Licence Application No.W0270-01**  
**Milltown Composting Systems Ltd**

**Prepared For: -**

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

**Prepared By: -**

O' Callaghan Moran & Associates,  
Granary House,  
Rutland Street,  
Cork.

**19<sup>th</sup> May 2010**

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## 1. INTRODUCTION

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Miltown Composting Systems Ltd (Miltown), wishes to object under Section 42 of the Waste Management Acts, 1996 to 2010, to a number of the Conditions and Schedules in the Proposed Decision (PD) for a Waste Licence, Application Register No.W0270-01, for an organic waste composting facility at Miltownmore, Fethard, County Tipperary. Miltown is the applicant.

Section 2 contains the grounds for the objections. The actual Conditions are presented in italics followed by Miltown's grounds for objection. The fee for the objection (€500.00) has been sent by post.

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## 2. GROUNDS FOR OBJECTION

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### Condition 3.7.1:

*3.7.1 Items of plant deemed critical to the efficient and adequate processing of waste at the facility shall be provided on the following basis:-*

- (i) 100% duty capacity;*
- (ii) 20% standby capacity available on a routine basis; and*
- (iii) Contingency arrangements and/or back up and spares in the case of breakdown of critical equipment,*
- (iv) Biofilters - a minimum of 2 to ensure treatment of emissions during the replacement of bed media in one of the biofilters.*

The requirement to provide two biofilters at the facility, with one only to be used when the filter bed media is being changed is excessively onerous from a financial viewpoint and is not practical in terms of the space available adjoining the buildings.

The existing biofilter is divided into two compartments, which allows the sequential changing of the filter media without the complete shut down of the filter. The filter media can be changed over 2-3 days. While the filter will not operate at maximum efficiency when the media is being changed, this will not, given the location of the facility, cause an impact on the nearest sensitive receptors, which are more than 900m from the facility boundary.

Miltown requests that the Condition be amended to remove the requirement to provide two biofilters.

### Condition 3.11:

#### *3.11 Continuous Monitoring System*

*Within six (6) months of the date of grant of this licence a continuous monitoring system shall be installed and maintained at the facility. All facility operations linked to the telemetry system shall also have a manual control which will be reverted to in the event of break in power supply or during maintenance. As a minimum the system shall record and relay the following information:*

- (i) temperature and oxygen content of the compost at all stages during its production*

## Schedule C

### *Table C.1.4 Monitoring of Composting Processes -Oxygen Content -*

The existing monitoring system allows for the continuous monitoring of temperature. Operational experience has shown that monitoring of the temperature is all that is required to ensure a suitable product is produced and that there is no need to monitor oxygen. Milltown requests that the Condition and Schedule be amended to remove the requirement to monitor oxygen levels.

## Condition 6.7 Meteorological Monitoring

*6.7 The licensee shall provide and maintain suitable infrastructure at the facility for the automated monitoring and recording of wind speed, wind direction and rainfall.*

This condition requires the provision on an on-site weather station. Milltown considers that, in the context of the site location and distance from sensitive receptors that an on-site station is not required in order to ensure that facility activities will not result in any impacts offsite.

## Condition 12.1

### *12.1 Agency Charges*

*12.1.1 The licensee shall pay to the Agency an annual contribution of €7,612.00 or such sum as the Agency from time to time determines, having regard to variations in the extent of reporting, auditing, inspection, sampling and analysis or other functions carried out by the Agency, towards the cost of monitoring the activity as the Agency considers necessary for the performance of its functions under the Waste Management Acts 1996 to 2010. The first payment shall be a pro-rata amount for the period from the date of commencement of enforcement to the 31<sup>st</sup> day of December, and shall be paid to the Agency within one month from the date of the completion of the extension for the facility. In subsequent years the licensee shall pay to the Agency such revised annual contribution as the Agency shall from time to time consider necessary to enable performance by the Agency of its relevant functions under the Waste Management Acts 1996 to 2010, and all such payments shall be made within one month of the date upon which demanded by the Agency.*

Milltown considers the sum of €7,612.00 to be excessive based on the nature of the activity, the extent of the monitoring that the Agency is likely to carry out and the current economic climate. Milltown requests that the initial annual contribution be reduced to €3,000.00.

*Schedule C Control & Monitoring*

*Table C.2.1 Monitoring of Emissions to Water*

*Note 1. The licensee shall install a composite sampler within three months of the date of grant of this licence. All samples shall thereafter be collected on a 24 hour flow proportional composite sampling basis*

The emissions to surface water are linked solely to rainfall incidents, which are intermittent and very rarely of a 24 hour duration that would allow for flow proportional sampling. Milltown requests that the requirement for 24 hour flow proportional composite sampling be removed.

*Table C2.2 Noise Monitoring*

The monitoring frequency specified is quarterly. This is not consistent with Condition 6.25, which specifies that monitoring be carried out annually. Milltown requests that the frequency be amended to annually.

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