

**D Richards / L Leacy (Sharing)**

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**From:** David Naughton [david.naughton@panda.ie]  
**Sent:** 21 May 2010 15:54  
**To:** Licensing Staff  
**Subject:** New Applicant objection entered for Reg no: W0261-01. (Reference Number: W0261-01-100521035340)  
**Attachments:** 1380501 PD OB May 2010.pdf  
**Importance:** High

**Title:** Mr  
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**Objector Type:** Applicant  
**Oral Hearing:** No

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**Objection To**  
**Proposed Decision**  
**Waste Licence Application No. W0261-01**  
**Nurendale Ltd**

**Prepared For: -**

Nurendale Ltd,  
Cappagh Road,  
Cappoge,  
Fingals,  
Dublin 11.

**Prepared By: -**

O' Callaghan Moran & Associates,  
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**20<sup>th</sup> May 2010**

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O' Callaghan Moran & Associates. Registration No. 3272844U

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## 1. INTRODUCTION

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Nurendale Ltd, trading as PANDA Waste (PANDA), 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.W0261-01, for its Materials Recovery Facility at Cappagh Road, Cappoge, Finglas, Dublin 11, PANDA is the applicant.

Section 2 contains the grounds for the objections. The actual Conditions are presented in italics followed by PANDA's grounds for objection. The fee for the objection (€500) is enclosed.

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## 2. GROUNDS FOR OBJECTION

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### Condition 1.2 and Schedule A:

*1.2 Activities at the facility shall be limited as set out in Schedule A: Limitations of this licence. Until such time as the proposed 'stage2' infrastructure (i.e Dry Recyclables Building and Paper and Cardboard Building) has been installed to the satisfaction of the Agency, annual waste intake shall be limited to 50,000 tonnes per annum. Subject to the agreement of the Agency the, licensee shall be permitted to accept a maximum intake of 200,000 tonnes per annum*

**Schedule A** approves the acceptance of 50,000 tonnes of Construction and Demolition Waste but does not allow the acceptance of Dry Recyclable Household, Commercial and Industrial waste or Paper and Cardboard in Stage 1. Note 1 allows for the limitation on individual non-hazardous waste types to be varied subject to agreement with the Agency.

Due to the downturn in the economy, the volume of Construction and Demolition Waste generated in the Dublin Region has significantly reduced however there remains a need to provide recycling capacity for Dry Recyclables & Paper/Cardboard. The Dry Recyclables, Paper & Cardboard can be processed in a designated area inside the existing building and this will not require the provision of any new or augmentation of existing mitigation measures.

PANDA requests that Schedule A be amended to allow for the acceptance of 10,000 Dry Recyclables and Paper and Cardboard and 40,000 tonnes of C&D waste in Stage 1. The overall annual inputs will not exceed 50,000 tonnes until Stage 2 is completed.

### Condition 1.3 and Note 3 Schedule A:

*1.3 Mixed Municipal Solid Waste shall not be accepted at the facility*

*Note 3 Excluding mixed municipal solid waste:*

Only dry recyclable from the household and commercial & industrial wastes will be accepted at the facility. However the term mixed municipal waste and the associated EWC Code 20 03 01 is applied by waste operators, including PANDA, to the mixed dry recyclables collected in the 'green bin' as there is no single EWC Code for the contents, which can include, paper, cardboard, plastic, glass and textiles. The code is assigned dry recyclables in the weighbridge recording system. The Agency also assigns EWC 20 03 01 to mixed dry recyclables in the National Waste Survey Returns that are completed by the Local Authorities.

To avoid confusion when auditing weighbridge records and compiling the Annual Environmental Report returns, PANDA requests that the term mixed municipal solid waste be amended to 'mixed municipal waste containing putrescible materials'.

### Condition 8.1

*All waste processing (including timber shredding and gypsum recovery) shall be carried out inside the materials recovery and transfer building) All wastes/materials shall be stored within the materials recovery and waste transfer buildings except wood, metals, masonry wastes and other wastes/ materials with the prior agreement of the Agency which can be stored in the open yard.*

While it is acknowledged that this Condition allows the storage of wastes/materials other than those specifically referred to, subject to the Agency's approval, in order to avoid confusion in future compliance audits, PANDA requests that baled plastics and bales paper/cardboard be included in the list of materials that can be stored in the open yard.

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**From:** licensing@epa.ie  
**Sent:** 21 May 2010 15:57  
**To:** david.naughton@panda.ie  
**Cc:** Licensing Staff  
**Subject:** Successful Objection Payment for Licence Number W0261-01. (Reference Number: W0261-01-100521035340)

Thank you for your online Applicant Objection for licence number W0261-01. Your objection has been received by the Environmental Protection Agency and will be acknowledged once the Objection has been validated.

A fee of €500 will be debited from your credit card once the objection has been confirmed.

Your reference number is W0261-01-100521035340. Please retain this for future reference.

Regards,

Environmental Protection Agency

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