

**Dorota Richards**

Sub 15

**From:** Noeleen Keavey  
**Sent:** 01 October 2010 10:59  
**To:** Grainne Oglesby; Dorota Richards  
**Subject:** FW: New submission entered for Reg no: W0136-03. (Reference Number: W0136-03-100930100621)  
**Attachments:** EPA Objection Letter.docx  
**Importance:** High

**From:** Eoin Cullinane [mailto:ekcullinane@gmail.com]  
**Sent:** 30 September 2010 22:06  
**To:** Licensing Staff  
**Subject:** New submission entered for Reg no: W0136-03. (Reference Number: W0136-03-100930100621)  
**Importance:** High

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Eoin Cullinane,  
Sarsfields Court,  
Glanmire,  
Cork.

EPA Headquarters,  
PO Box 3000,  
Johnstown Castle Estate,  
Wexford.

30<sup>th</sup> September 2010

Dear Sirs,

**Re.: Waste Licence Review Reg. No.: W0136-03– Sarsfields Court Ind. Est., Sarsfields Court, Glanmire, Cork.**

***“...to extend the waste acceptance and operational hours to allow for 24 hour waste acceptance and operation; to allow the development of a Civic Amenity area that will be used by members of the general public and will accept small volumes (approximately 10 tonnes per annum) of hazardous household waste; to increase the waste acceptance limits pro-rata from 99,017 to 200,000 tonnes per annum of household, commercial, and industrial and construction and demolition wastes; to remove the requirement to achieve an annual 50% recovery rate, and to revise the compliance locations for noise emission limits from the site boundary to the nearest noise sensitive location....”***

I am writing to you in relation to the above mentioned proposed development at Sarsfields Court Ind. Est., Sarsfields Court, Glanmire, Cork by Greenstar Recycling (Munster) Limited.

I wish to object to the above waste licence review on the following grounds:

1. **Odours**
2. **Drainage & Water Quality**
3. **Removal Of 50% Recovery Rate**
4. **Noise**
5. **Other Environmental Concerns**
6. **History Of Site**

The above main points of objection are explained in greater detail over the following pages, including references to Irish and European Legislation and other relevant documentation.

## 1. Odours

Section 15.5 of the EIS states *“the facility was designed and is operated in a manner that either eliminates, or minimises to the greatest practical extent the risk of environmental nuisance, (noise, litter, vermin, and odours)”*.

However, in May of 2006 the EPA prosecuted Greenstar Recycling (Munster) Ltd. for breaches to its waste licence at the Sarsfields Court Industrial Estate facility. The prosecution related to odour nuisance at the facility and in the immediate area of the facility. This prosecution came about as a result of a significant number of complaints relating to odour nuisance.

An EPA inspectors report in June 2009 in response to a request by the applicant for a technical amendment of the waste licence states that *“an Office of Environmental Enforcement audit in December 2008 resulted in 7 non-compliances and several observations, relating to various conditions of the licence, including waste storage outside the waste transfer building”*.

An EPA inspectors report in November 2009 in response to a second request by the applicant for a technical amendment of the waste licence states *“the Office of Environmental Enforcement when consulted on the amendment request, have indicated that there are odour nuisance concerns about the facility”* and that *“it should also be noted that there have been several odour complaints about the facility received by the agency in 2009 from members of the public”*.

It is clear from the above examples that the facility is not being operated in a manner that eliminates or minimises odours to the greatest practical extent as stated in the EIS.

**Any odour or other environmental concern relating this facility seriously impact on property values in the area as well as impacting on the environment, the health and well-being of those living in the locality and residential amenities.**

**In the EPA press release dated May 4<sup>th</sup> 2006 (see appendix 1 attached) it states that *“the EPA cannot issue a licence to any waste activity unless it is satisfied that the activity will not cause environmental pollution”*.**

Based on the above examples it would be reasonable for the EPA to refuse this waste licence review as it could not be satisfied that the granting of this waste activity will not cause environmental pollution based on the past history of this facility.

- Storage on site is another major cause for concern. As previously stated there have already been many recorded complaints regarding odours emanating from the facility and indeed the facility was prosecuted in 2006 for being in breach of its waste licence in relation to odours. The dramatic increase in the amount of waste, particularly household waste, proposed will inevitably lead to storage of waste on the site. Section 1.2 of the EIS states that *"the majority of waste will continue to be accepted during normal business hours"* and it can be assumed from this that this could lead to both additional storage of waste on site, including possible storage outside of the waste transfer building, and to delays in processing due to such a large number of vehicles arriving together which would lead to queuing of vehicles. This has huge environmental concerns as this amount of putrescible waste will inevitably create rodent and odour problems in the area.
- Odours emanating from the site are a major cause for concern. It is proposed to accept over twice the amount of total waste at the facility and it is also proposed to greatly increase the percentage of household waste which will lead to an increase from *"47,129 tonnes to approximately 90,000 tonnes per annum"* of household waste. Section 12.2 of the EIS states that *"Greenstar installed and commissioned an air emission abatement system in the MRTF building in 2006"*. Section 12.4 of the EIS states *"that the existing system has the capacity to effectively treat the air in the mixed waste area and the proposed extension of the operational hours and increases in waste volumes will not result in any increase in odour impacts"*. Despite the fact that the odour abatement systems were installed and updated in 2006 and 2007 respectively, from May 2008 to January 2010 there were at least 12 recorded complaints to Greenstar in relation to odours emanating from the facility as well as several complaints in 2009 to the Office of Environmental Enforcement relating to odours from the facility.

**It is reasonable to assume that while the abatement system remains unchanged, by greatly increasing the volume of the most odorous of wastes, household waste, there is greater potential for increased frequency of odorous emissions which would be injurious to the amenities of existing residential properties as well as impacting on the environment, health and well-being of those living in the locality and the quality of life of those living in the surrounding environs.**

## 2. Drainage & Water Quality

- As the site is a hard-standing area open to the weather it could also lead to contaminated run-off. Section 6.2 of the EIS states that *“the climate in the area can be described as mild and wet”*. Given the wet climate and as it is likely that there will be trucks queuing on site, full of waste, it is very possible that there will be some contaminated run-off on the site which, as indicated in the ‘Drainage Layout’ drawing (submitted to Cork County Council in the concurrent planning application – see appendix 2 of this submission), will be running through a silt trap, which will only remove solid waste, and an oil interceptor which is only designed for separating oil and liquids lighter than water. Any bacteria or contamination in the water will therefore not be treated before entering into an underground drain to a nearby stream which leads straight to the Glashaboy River.

**As the Glashaboy River provides water for the greater Glanmire area, this could have serious health and environmental risks.**

- The proposed drainage for the new civic amenity area is a great concern. The proposed drainage system indicated in the ‘Drainage Layout’ drawing is severely inadequate.

The first point of note is that, as stated above, all contaminated run-off from this area, the only area of the site where hazardous waste is proposed to be collected, will be flowing untreated into a contributory stream for the Glashaboy River. It must be presumed that most waste brought to this civic amenity area will be done so in an open trailer which combined with the wet climate of the area will lead to run-off.

The second point of note is the inadequacy of the proposed drainage layout. The ‘Drainage Layout’ drawing indicates all run-offs from the civic amenity area will be flowing into “Drain Channel 6” and “Drain Channel 7” at the south-eastern end of the civic amenity area. However it is clear from the spot-heights shown on this drawing and from the ‘Cross Section A-A’ (submitted to Cork County Council in the concurrent planning application – see appendix 3) that this area falls to the east and therefore all run-off will flow eastwards towards the private industrial estate road where it will either flow off the site and contaminate other properties and possibly private bore-holes, or be allowed to gather and become stagnant in this location. It should be noted that the ‘Site Layout Plan’ indicates a green waste bin and a municipal solid waste bin (municipal solid waste being predominantly domestic waste) situated in the north-eastern side of the civic amenity area. As the ground falls to the east, rainwater and other run-off will flow directly at these two bins before continuing towards the industrial estate road.

**The proposed drainage layout is clearly unsatisfactory and poses a danger to residents of the locality, employees of businesses in the industrial estate, and indeed the greater Glanmire area, and a serious environmental threat.**

**3. Removal of 50% Recovery Rate**

The proposal by the applicants to remove the condition requiring the facility to achieve an annual recovery rate of 50% is of great concern. The EPA considered this a very important part of the original waste licence application for this facility. The EPA inspectors report for waste licence 136-1 states *“the applicant has proposed to recover 25% of all wastes accepted at the facility and in addition, the proposed decision requires proposals to further pursue recycling and recovery of certain waste in line with national policy”*. **The EPA at the time must have considered the recycling and recovery element of this facility to be of great importance and increased the recovery rate to 50%.**

The applicant indicates in section 5 of its 2009 Annual Environmental Report that the facilities estimated recovery rate for 2009 is 27.52%. Table 5.3 below from the same report shows the facilities recovery rates since 2005.

**Table 5.3 Waste Received & Consigned**

	2008	2007	2006	2005
Total Received	61,288.71	88,009.32	68,962.92	67,272.68
Total Consigned	61,879.66	89,229.89	68,664.82	66,486.44
Total Recovered	21,254.99	23,797.77	29,861.54	26,719.68
Total Disposed	40,721.72	65,432.12	38,803.28	39,766.76
Recovery Rate	34.29%	26.67%	44%	40%

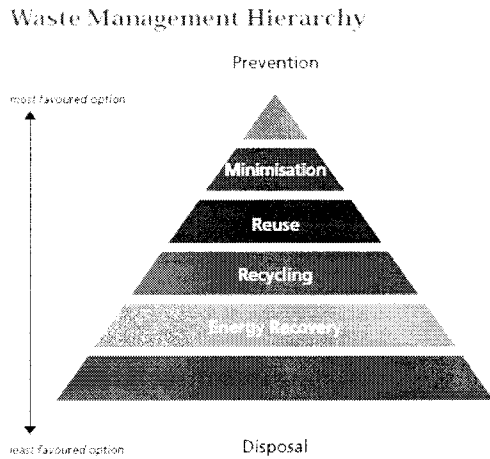
**It is a great cause for concern that this facility has not reached its required recovery rate even once in the past 5 years.**

By reason of explanation for this failure to comply with a specified condition in its waste licence, the applicant states *“the reason for the reduction in the recovery rate from 2006 (44%) is due to the acquisition by Greenstar of a dry recyclables facility permitted by Cork County Council (WFP-CK-0047-02) also located within Sarsfields Court Industrial Estate in late 2006. The dry recyclables waste stream, which was processed at the licensed site is now directed to the permitted site as this site specialises in the recovery of this waste type”*.

It is considered that this explanation cannot be accepted as a valid reason for breaching a specified condition of the facilities waste licence. This condition of a recovery rate of 50% was included in the waste licence for this facility in line with national policy and as a means for controlling the scale and use of the facility. If this condition can be removed simply because of the proximity of another recycling facility nearby, then it follows suit that all other waste transfer facilities could equally apply to remove their existing recovery rates by simply stating that the dry recyclables waste stream which was processed at their facility is now being directed to a different site specialising in the recovery of this type of waste.

**The re-direction of dry recyclables to another facility cannot be seen as a valid reason for removing all requirements for recovery. This would set a negative precedent which could easily be followed by many other licensed facilities.**

The government policy statement ‘Preventing and Recycling Waste – Delivering Change’ clearly indicates the most favoured options with regard to treatment of waste, as can be seen by the ‘Waste Management Hierarchy’ pyramid to the left.



Prevention and minimisation are the most preferred options while disposal is the least preferred. **If this proposed waste licence review is granted, it would be contradicting the governments own policy on waste management.** As this facility proposes to remove the recycling recovery rate of 50%, and given that there are no energy recovery proposals on this site (due to site suitability), it is assumed that this facility would become just a baling facility prior to disposal at a landfill. This government policy also states that *“landfill should be a last resort after all other options have been exhausted”*.

If the facility were to be granted this waste licence review it would be entitled to accept 200,000 tonnes of waste per annum. If it was to recover 25% of this waste it would still leave a possibility of approx. 150,000 tonnes per annum of waste consigned to landfills from the site, most of which would be household and commercial biodegradable municipal waste.

EU Directives state that Ireland must establish a strategy for the reduction of biodegradable waste going to landfills. By 1<sup>st</sup> January 2013 Ireland can only landfill a maximum of 644,956 tonnes and by 1<sup>st</sup> January 2016 Ireland can only landfill a maximum of 451.469 tonnes.

**Surely the EPA could not justify the possibility of this single facility being responsible for 20% and 33% of all waste consigned to landfills in 2013 and 2016 respectively. Particularly a facility which was initially granted a waste licence primarily as a waste recycling facility with the obligation to recover 50% of all waste consigned to the facility and was initially permitted to accept only 1,159 tonnes of household waste per annum.**

Such strict conditions were placed on the initial waste licence 136-1 in line with national and EU policies and also as a means of regulating and controlling this facility given its location in a small business and commercial park in a primarily residential, rural area.

The EPA must take into account all EU Directives and all Regional and National Policies in relation to recovery and re-use of waste and siting of large scale waste facilities when considering this waste licence review.

**The EPA along with Local Government must put the onus on private waste management companies to develop facilities, in appropriate locations, in line with EU and National Policies and should not grant waste licences or planning for facilities based on the company stating that they have not yet constructed an appropriate facility but aim to do so in the future.**



4. Noise

- The noise assessment clearly indicates that the noise emission limits as specified by the EPA in schedule C.1 of waste licence W0126-02 were exceeded both during daytime testing and night-time testing at various measurement stations. It is suggested in section 2.5 of Appendix 7 of the EIS that station N9, being the only noise sensitive location, should be the only station to which the noise limits should apply, however the waste licence clearly specifies that the noise limits should apply to all measurement stations.

All current standards and practices state that noise limits are taken at the boundary of the proposed site and that attenuation due to distance is not relevant in relation to noise assessment. The reasoning behind this is so as not to infringe on the rights for those employed in adjacent buildings and premises, and those living in surrounding areas, to have reasonable working/living conditions and to limit the amount of noise pollution they are subjected to. Another key reason for current standards and practices taking noise limits from the boundaries of sites is so as not to impede any future developments from being able to take place in the surrounding areas.

As the facility only received 54,687.49 tonnes of waste in 2009, it is reasonable to assume that proposed noise emissions from the facility if it were to be receiving 200,000 tonnes per annum and operating a civic amenity area would be much greater at all stations, particularly those at the boundary of the site. **As the facility is situated in an estate where mostly light industrial and commercial offices reside, it is reasonable to assume that an increase in noise emissions would greatly impact on the health and welfare of others in the estate and the viability of these businesses to continue trading.**

- The EPA when assessing this waste licence review must take noise pollution from vehicle movements associated with the facility as well as noise pollution from the facility itself into account. The overall effect of this noise pollution relative to the existing dwellings in the area must be considered. The resultant noise pollution created by these vehicle movements should be assessed in relation to the existing conditions, particularly at night-time.

As there are no Irish Standards containing applicable guidance in this instance, best practice dictates that the potential noise impact is assessed against appropriate British Standards. BS 8233: 1999: Sound Insulation and Noise Reduction for Buildings – Code of Practice sets out recommended noise limits for indoor ambient noise levels in dwellings in the table below.

Criterion	Typical Situation	Design range $L_{Aeq,T}$ (dB)	
		Good	Reasonable
Reasonable resting/sleeping conditions	Living Rooms	30	40
	Bedrooms	30	35

Typically it is considered appropriate to select a rigorous criterion for night-time of 30dB and a less rigorous criterion for daytime of 40dB. The external limits should be derived based on these internal criteria. This is done by factoring in the degree of noise reduction afforded by a partially open window. BS 8233, Paragraph 8.4.7.3, Table 10 suggests this is in the range of 10 – 15dB. It is generally accepted that 10dB should be used in order to provide a ‘worst-case’ assessment.

Therefore the following criteria apply at the facades of the residential properties in the area:

- Daytime – 50dB
- Night-time – 40dB

Traffic noise is considered a nuisance even at low dB levels. Higher volumes of traffic and higher proportions of HGV’s increase the noise levels.

It is generally accepted that the noise level of a car travelling at 60km/h, measured 7m from the noise source, is 72dB and the noise level of a HGV travelling at 40km/h, measured 7m from the noise source is 85dB (*“Introduction to Environmental Impact Assessment – 3<sup>rd</sup> Edition”* by John Glasson, Riki Therivel and Andrew Chadwick, 2005).

The table below offers guidance as to the likely impact associated with any particular change in traffic noise level.

Change in Sound Level (dB La10)	Subjective Reaction	Impact
< 3	Inaudible	Imperceptible
3 – 5	Perceptible	Slight
6 – 10	Up to a doubling of loudness	Moderate
11 – 15	Over a doubling of loudness	Significant
> 15		Profound

**A night-time traffic survey would be required to adequately assess the volume of HGV’s at present travelling the roads during the night-time hours and to assess the impact 24 hour operations at the facility would have on the inhabitants of dwellings in the locality.**

The World Health Organisation’s ‘Guidelines for Community Noise’ states that *“sleep disturbance is a major effect of environmental noise”* and that *“uninterrupted sleep is a prerequisite for good physiological and mental functioning”*. It also states that *“the difference between the sound levels of a noise event and background sound levels, rather than the absolute noise level, may determine the reaction probability. The probability of being awakened increases with the number of noise events per night.”*

The number of noise events as well as the difference between the maximum sound level and background sound level must be measured so as to be able to adequately assess the effects of the HGV traffic at night-time.

The noise survey carried out by DixonBrosnan in relation to night-time operations as detailed in section 13 and appendix 7 of the EIS does not provide sufficient information to enable the EPA to adequately assess the potential effects of noise pollution arising from this waste licence review. The night-time survey was restricted to between the period of 18.40 – 20.00 hours. A survey throughout the night, i.e. between the hours of 22.00 and 07.00, must be carried out to be able to adequately assess the effects of this intensification of use in relation to current noise levels at all stated noise measurement locations during this night-time period and the effects on inhabitants of the area.

The combination of noise and vibrations can be particularly disturbing for people during the night-time hours. The EIS has failed to assess any additional vibrations caused by this intensification of use at the facility. It is generally acknowledged that humans are particularly sensitive to vibrations and that any perception of vibration may lead to concern. In the case of road traffic, vibration is perceptible at around 0.5mm/s and may become disturbing or annoying at higher magnitudes.

A survey would be required to accurately assess the effects of the noise and vibrations caused by the additional HGV traffic to and from the facility, both during the day and night, in relation to the existing dwellings on all approach roads to the facility if this waste licence review were to be granted.

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## 5. Other Environmental Concerns

- The proposed waste licence review and accompanying EIS does not in any way adequately assess the impact this development will have on the surrounding environment, the health and well-being of those living in the locality, residential amenities of the area or the potential de-valuation of properties.

Section 15 of the EIS states in its introduction that *“this section assesses the impacts of the facility on the local population. It describes the economic activity, social consideration, land uses, health and safety and significance of impact”*. There is little or no analysis or assessment of the impacts of the facility on the local population in the following paragraphs. In being able to adequately assess this aspect of the EIS and the proposed development as a whole, a more detailed and factual analysis must be required.

Section 17.2 of the EIS states *“neither the facility nor its immediate environs have a significant leisure or amenity potential.”*

Sarsfields GAA Club has two pitches less than 100m from the site. These pitches are used nearly every evening and also for large portions of the weekend. All age groups regularly use these pitches for training and recreation purposes and they are a valued local amenity. The entrance to these pitches is located directly across from the industrial estate entrance. The proposed intensification of use at this facility would have significant negative impacts on the amenity value of these pitches through traffic, odours, vermin and other environmental impacts.

**The local amenity value of this area must be preserved and indeed enhanced. Granting this waste licence review would have significant negative impacts on this local amenity and the environmental conditions of the locality.**

- **The details included do not adequately assess emissions to the atmosphere from traffic generated by the proposed development.**

Directive 2008/50/EC of the European Parliament states that *“air quality status should be maintained where it is already good, or improved”* and that *“the risk posed by air pollution to vegetation and natural ecosystems is most important in places away from urban areas. The assessment of such risks and the compliance with critical levels for the protection of vegetation should therefore focus on places away from such built up areas”*.

There will a 100% (minimum estimate) increase in HGV traffic to and from the facility which shall lead to a significant increase in emissions in a rural, agricultural area. Section 11.3.2 of the EIS states that *“potential increased emissions of pollutants from road traffic are not considered to be significant in the context of the existing traffic volumes using the industrial estate”*.

The existing light industrial uses in the industrial estate must be taken in the overall context of the location and therefore any assessment of emissions from traffic generated by the proposed development must relate to current air quality in this rural location.

**While the control of traffic numbers and road usage may be an issue for the Local Authority and National Roads Association, the control of emissions as a result of this intensification of use and the resultant negative effects on the air quality must be taken into account by the EPA when proposing a decision on this waste licence review.**

The following extracts from the EPA website (Environmental Monitoring – Air Section) indicate the importance in the control and monitoring of traffic emissions.

*“Air pollution can affect the health and well-being of sensitive population groups and ecosystems.”*

*“The biggest threat now facing our air quality is emissions from road traffic.”*

*“The Environmental Protection Agency (EPA) has overall responsibility for the co-ordination of ambient air quality monitoring in Ireland in accordance with these EU Directives.”*

**Given the location of the Sarsfields Hurling and Football training pitches in relation to the facility and in particular the main entrance of the industrial estate being adjacent to these pitches, there is a great concern for the children and teenagers who train on these pitches almost every evening of the week.**

**The health and welfare of children pursuing an active interest in outdoor activities such as this must be taken into consideration when assessing the environmental pollution associated with this development.**

- The potential for an increase in vermin in the area is a great cause for concern due to the increased amount of putrescible waste if this waste licence review were to be granted. As a result of such large amounts of waste arriving at the facility the probability of it being stored on site for a length of time prior to being processed would greatly increase the chance of vermin gathering in the area. There has already been an increase in rats, crows and other vermin in the area over the past 2 to 3 years and this can only increase as more waste gets consigned to the facility. This presents very serious health and safety issues given the proximity of the facility to the 2 Sarsfields Hurling and Football training pitches which as stated above, are used most nights of the week.
- The proposed civic amenity area is another cause of great concern. The acceptance of hazardous waste at this site greatly increases the dangers and safety implications for people working and living in the locality. There would also be a greater possibility of rubbish and waste being illegally dumped in the industrial estate and surrounding environs, as has been previously experienced at other civic amenity areas. The prevention of this illegal practice would be virtually impossible to police given the rural location of the facility.

## 6. History Of Site

- The original waste licence, 136-1, was issued on the 26<sup>th</sup> July 2001 with numerous conditions attached. The principle conditions being a restriction on the overall tonnage of waste, a breakdown of the maximum quantities of each waste type allowed, the obligation to recover a minimum of 50% of the waste consigned to the facility as well as restrictions on operating and waste acceptance hours.

There was very strong opposition to this licence in that 78 submissions were received in relation to the application.

The facility was constructed in 2002 and started accepting waste in July 2003.

Greenstar Recycling (Munster) Ltd. applied for a review of this waste licence on the 6<sup>th</sup> May 2003 and this was granted on the 17<sup>th</sup> May 2004. The principle change applied for was to alter the volumes of each waste type permitted to be accepted at the facility. It should be noted that there were no submissions received relating to this waste licence review.

**There is great concern in the locality that the site notices may not have been adequately displayed relating to this waste licence review as it clear from the opposition to the original planning application and waste licence, and from the opposition to the current planning application and waste licence review, that there would have been great concerns relating to this alteration in the waste licence. The vast majority of residents in the area were unaware until recently that the original waste licence was reviewed and altered at this time.**

- Issues of non-compliance with conditions and complaints:
  - There were 2 notifications of non-compliance issued in 2003, the first relating to the removal of a hedgerow and the second related to lack of records of waste acceptance and drainage inspections, inadequate site-notice board and non-labelling of a monitoring point.
  - In May of 2006 the EPA prosecuted Greenstar Recycling (Munster) Ltd. for breaches to its waste licence at the Sarsfields Court Industrial Estate facility. The prosecution related to odour nuisance at the facility and in the immediate area of the facility. This prosecution came about as a result of a significant number of complaints relating to odour nuisance.
  - In December 2008 an Office of Environmental Enforcement audit resulted in 7 non-compliances and several observations, relating to various conditions of the licence, including waste storage outside the waste transfer building.
  - An EPA inspectors report in November 2009 states *"the Office of Environmental Enforcement when consulted on the amendment request, have indicated that there are odour nuisance concerns about the facility"* and that *"it should also be*

*noted that there have been several odour complaints about the facility received by the agency in 2009 from members of the public”.*

- There have also been numerous complaints to Greenstar, as detailed in their Annual Environmental Reports, in relation to odours emanating from the facility.
- The documentation submitted by Greenstar with this waste licence review, along with its AER’s, clearly indicate that the facility has failed to recover a minimum of 50% of the waste consigned to the facility over the past 5 years. This is a breach of condition 1.8 of waste licence 136-2.
- The EIS clearly indicates that the noise emissions from the facility have exceeded the limits set out in waste licence 136-2, this is a breach of condition 6.1.

Based on the above examples of past non-compliances with waste licence conditions, as well as recorded complaints, it would be reasonable for the EPA to refuse this waste licence review as it could not be satisfied that the granting of this waste activity will not cause environmental pollution based on the past history of this facility.

- The 1:2500 site location map indicates the positions of the public site notices as being on the entrance to the facility on the private industrial estate road and also at the entrance to the industrial estate from the public road. Through regular monitoring of the entrance to the industrial estate from the public road, it is clear that no site notice has been erected at this position and therefore this application should not be deemed to be compliant.

Below are photographs taken at the entrance to the industrial estate entrance from the public road on July 20<sup>th</sup>. As can be clearly seen there is no site notice erected. Further photographic records of the same entrance taken on many other dates are available if required showing no site notice erected.



## Conclusion

There has been no rationale put forward by the applicant for the need for this excessive increase in the current business activity. Figures taken from the 'Annual Environmental Reports' for waste licence W0136-02 indicate that the average amount of waste received by this facility each year for the last five years is well below the present capacity at 68,046.224 tonnes per annum. Indeed it should also be noted that the waste received by the facility in 2008 was 61,288.71 tonnes and 2009 was 54,697.49 tonnes. There has been no rationale or justification put forward in this waste licence review to suggest any need for this excessive increase and expansion of activities.

The proposed waste licence review is in conflict with many government and EU guidelines and policies in relation to waste management.

Key issues such as environmental impact, health and safety issues relating to those living in the locality, impacts on residential amenity and devaluation of properties in the area have not been comprehensively addressed in this current proposal.

I firmly believe that this current proposal for the development of this site will make a very negative contribution to the local area and its residents and would therefore be contrary to the EPA mission statement: ***"To protect and improve the natural environment for present and future generations, taking into account the environmental, social and economic principles of sustainable development"***.

I trust that the EPA will take these considerations into account in their assessment of this waste licence review.

Yours faithfully,

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Eoin Cullinane



**Appendix 1.**

EPA press release dated 4/5/06

**EPA Prosecutes Greenstar Recycling (Munster) Ltd****Date released:** May 04 2006, 3:24 PM

On May 4th, 2006 at Cork City District Court the Environmental Protection Agency (EPA) prosecution against Greenstar Recycling (Munster) Ltd, Sarsfieldcourt Industrial Estate, Glanmire, Co. Cork was concluded. The EPA took the prosecution in relation to an offence under Sections 39 of the Waste Management Acts 1996 - 2003 for a breach of its Waste Licence Reg. No. 136-2. The prosecution related to odour nuisance at the facility, and in the immediate area of the facility.

Judge O'Leary found the case proven but in the circumstances applied the Probation Act and awarded costs to the EPA totalling €20,000.

Greenstar Recycling (Munster) Ltd was granted a waste licence (Reg. No. 136-1) in 2000 and a revised licence (136-2) in 2004 for the operation of a non-hazardous waste transfer station located at Sarsfieldcourt Industrial Estate, Glanmire, Co. Cork.

This prosecution was taken following a significant number of complaints of odour nuisance being made to the EPA between 7th February 2005 and 2nd September 2005 and numerous site inspections undertaken by the EPA's Office of Environmental Enforcement during that same period.

The EPA welcomed the decision on what was a difficult issue, relating to odour nuisance. This case has underlined the responsibilities of operators of waste activities in relation to their management and prevention of odour nuisance and clarified the role of regulators in their assessment and classification of odour nuisance.

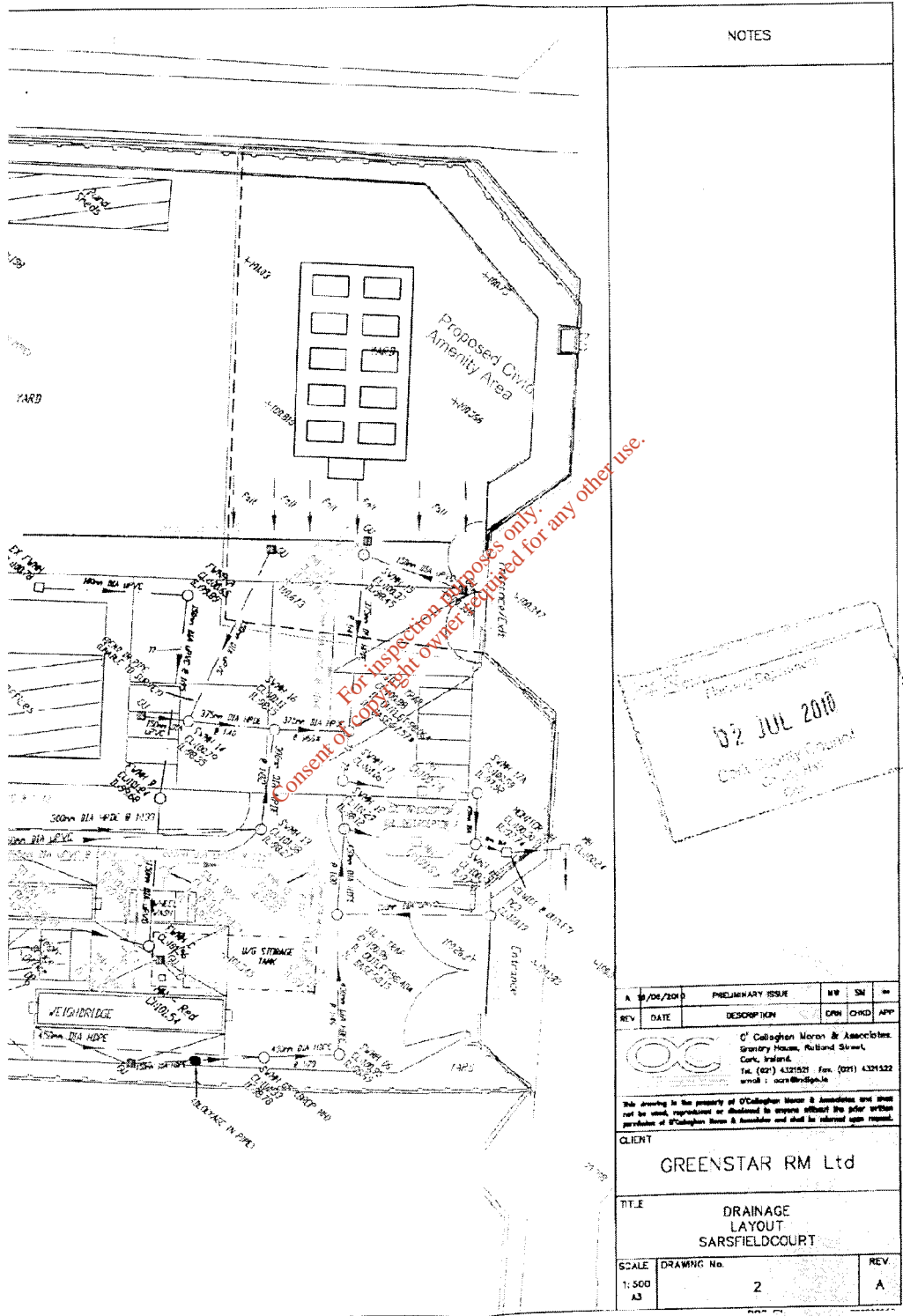
**Editors Note:**

The EPA cannot issue a licence to any waste activity unless it is satisfied that the activity will not cause environmental pollution. In order to ensure that this is the case the EPA inserts strict conditions into a licence to be complied with by the waste activity.

EPA licences include strict conditions relating to odour control and the installation of odour abatement equipment. The failure or delay by waste activities to comply with such conditions and install the correct abatement equipment has the potential to cause odour nuisance.

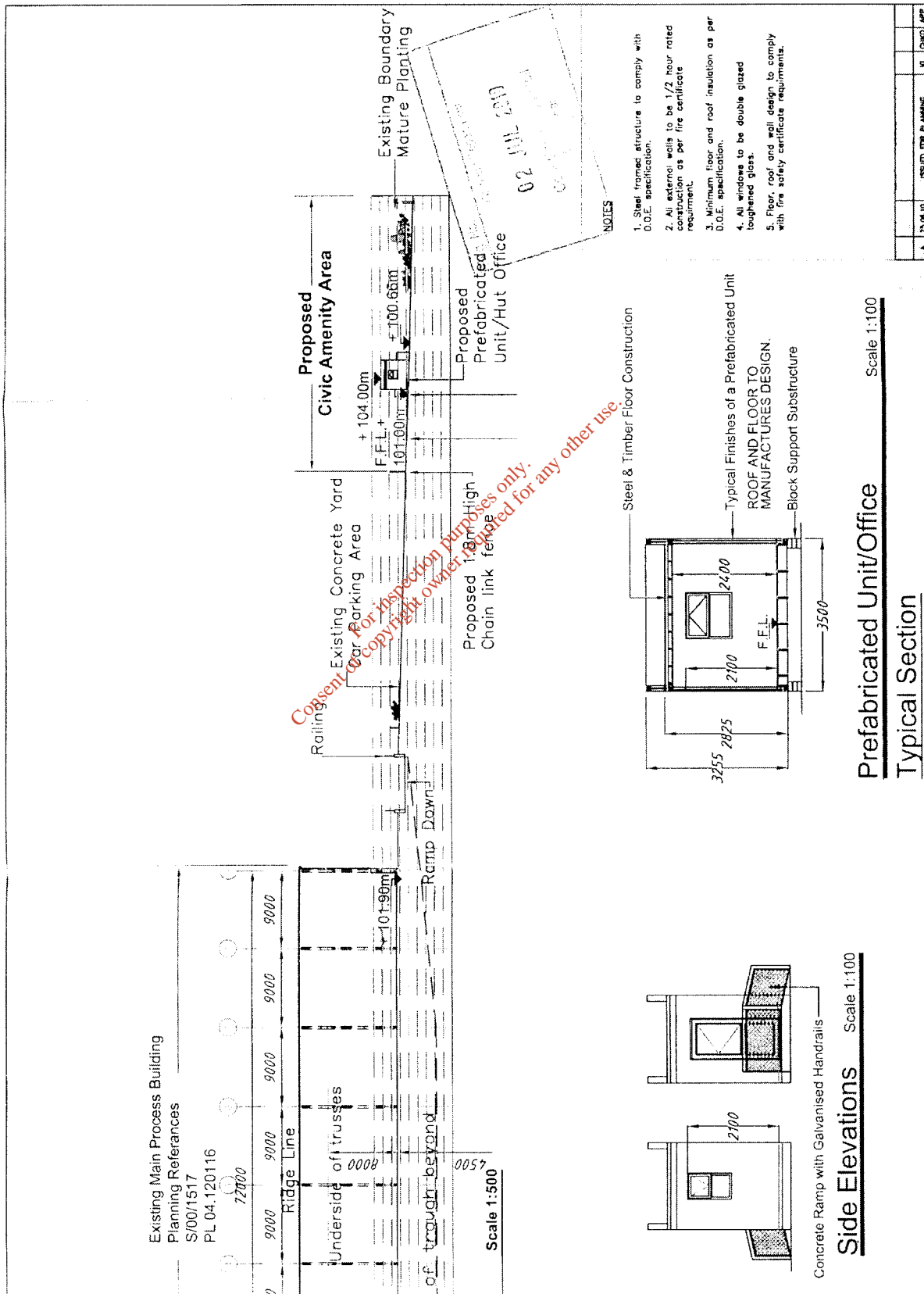
Appendix 2.

Section of Drainage Drawing Submitted to Cork County Council



Appendix 3.

Section of Cross-Section A-A Submitted to Cork County Council



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