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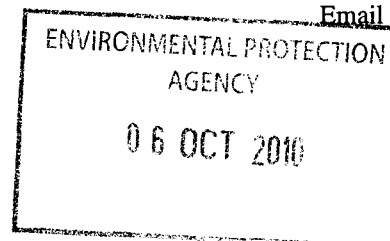
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Addressee

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Environmental Protection Agency
Headquarters PO Box 3000
Johnstown Castle Estate
County Wexford



Via email (j.kennedy@epa.ie & info@epa.ie), fax (053 9160699) and post.

5th October 2010

Our ref: 22307-09/JN/PW.cfc

Your ref: Reg No. W0161-02

**Re: Objection to the proposed decision of the Agency on Waste Licence Application by
Cork County Council re: facility at Bottle Hill County Cork Ref: WL W0161-02
Our client – Bottlehill Environmental Alliance**

Dear Ms Kennedy

Thank you for your letter of the 6th September with enclosed objection and we note the opportunity to comment thereon.

Our clients wish to endorse the objection filed by Carrignavar Community Council Limited. The Council's objection to the removal of the baling condition echoes our client's own objection and our clients' wish to make some additional observations on this topic.

Our client's submit that the removal of the baling requirement would be ultra vires the Agency having regard to the purpose and scope of the Licence Review as set out by the Agency itself in its letter dated 23 December 2009 to the Director of Services, Cork County Council and elsewhere. Please refer to the said letter and related press notice.

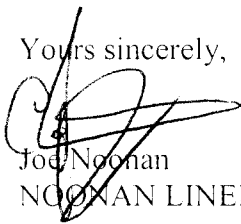
A letter in almost identical terms issued from the Agency to Greenstar Limited dated 18 June 2009 referring to a review initiated by the Agency of that company's licence for Knockharley Landfill. As with Bottlehill, that review was directed at updated conditions to address biodegradable municipal waste issues in the context of the Landfill Directive.

Several requested amendments to the existing Greenstar licence were rejected by the Agency following consideration of its Inspector's report dated 31 August 2009 which stated that the requested changes went outside what were described as 'the confines of this limited review'. See the Inspector's report cited above in particular at point number 13, point number 14, and point number 16.

The EPA's review of the Bottlehill licence is being carried out on the same basis as its review of the Knockharley licence. We note for the record that the Agency's simultaneous review of the Arthurstown Landfill licence held by South Dublin County Council made no change to the existing stipulation that waste received must be in baled form.

The residents of Bottlehill and surrounding areas expect the Agency to show consistency in its approach and to confine any changes in the Bottlehill licence to those consistent with the limited nature of the review underway. The proposal to omit the baling requirement is patently not such a change.

Yours sincerely,



Joe Noonan

NOONAN LINEHAN CARROLL COFFEY

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