

Ms Aoife Loughnane
Environmental Protection Agency
Regional Inspectorate, McCumiskey House
Richview, Clonskeagh Road
Dublin 14

Indaver Ireland Limited
Carranstown
Duleek
Co Meath

27th September 2010

Dear Aoife,

Further to our recent discussions and submissions, it has come to our attention that our neighbours, Irish Cement Limited have recently received a proposed determination (P0030-04). We would like to raise the following points for consideration regarding their license and our own, as the two processes are similar in many regards.

In reference to Condition 2.1.1 of P0030-04. This condition refers to employing a suitably qualified and experienced installation manager. This is referred to without timelines on their experience. We consider this to be reasonable and would encourage a similar approach in our proposed determination.

Condition 2.2.2.7 We would welcome consistency in relation to the communications programme which we must provide in relation to what Irish Cement Limited must provide. As specified in our unsolicited information sent in August 2010 there are inherent difficulties with providing real time data on the internet. Also since Irish Cement Limited will be treating waste in a similar fashion to us and don't need to provide this information (temperature of furnace etc) on the internet then it could be queried as to why we must provide it.

Condition 3.2.2 We would draw your attention to the information required for the facility board. The Irish Cement Limited site is also accepting waste and does not have hours of acceptance displayed, rather they have their hours of operation.

Condition 4.5 We would request that the condition 4.5 is considered for inclusion in our proposed determination in the interest of consistency.

Condition 5.4 makes no reference to ensuring that vermin and birds don't create a nuisance at the facility rather mud, dust and litter are mentioned along with odour. We would welcome consistency in this regard to our condition 5.5 of W0167-01.

Condition 11.1 Irish Cement Limited are required to give one months notice prior to them accepting alternative fuels including waste on site whereas we are obliged to inform the Agency of the commencement of acceptance of waste 7 months in advance. Again in the interest of fairness and consistency we would appreciate this being reviewed for W0167-02.

Condition 11.5 Since it is required that it is only environmental complaints that are to be recorded in the complaints section we will assume for our licence W0167-01 that complaints refer to environmental complaints only.

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Condition 11.11 Again to ensure uniformity between the industries it is stated in W0167-01 that we must retain records for 10 years after the termination of licensee/customer agreements whereas Irish Cements condition is for two years. We would welcome consistency in this regard.

Condition 12.1.1 We would like your opinion on the difference in the license fee between ourselves and our neighbours.

Also, W0167-01 requires us to install a meteorological station (Condition 3.2.2.1) but Irish Cement Limited do not have this requirement. Perhaps it could be reviewed whether or not it is a requirement for us to install this for our proposed determination.

We would appreciate if the above was taken into consideration in regards to our own proposed determination, to ensure consistency and fairness among the relevant industries.

Kind Regards,



Grace McCormack
Quality and Environmental Manager MSW
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Carranstown,
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