



MEMO

TO: Licensing, Wexford
FROM: Michelle McKim,
OEE Castlebar

CC: Kealan Reynolds
Mick Henry
DATE: 22/11/2010

SUBJECT : Greenstar Holdings Limited – East Galway Residual Landfill Site W0178-02
Request for a Technical Amendment

Greenstar Holdings Limited was granted a Waste Licence (W0178-01) on 26/07/2004 for the East Galway Residual Landfill Site in Kilconnell, Ballinasloe, Co. Galway. The facility was licensed to accept up to 100,000tpa of treated non hazardous household, commercial and industrial waste for disposal in the engineered landfill and began waste acceptance in 2005.

Schedule A of the Waste Licence W0178-01 outlined the waste categories and quantities for disposal at the landfill i.e. a total of 45,000tpa household, 27,500tpa commercial and 27,500tpa industrial wastes. The tonnage of household, commercial and industrial wastes could be altered with the prior agreement of the Agency provided that the total amount of these wastes accepted at the facility did not exceed the combined tonnage of 100,000tpa.

A revised Waste Licence W0178-02 was granted on 23/03/2010. The licence review was to accommodate requirements in relation to the diversion of biodegradable waste from landfill. As part of the review Condition 5.10 in relation to asbestos acceptance was also amended to permit and control the acceptance of asbestos waste for disposal at the landfill. Schedule A was amended to create a limit of 3,000tpa asbestos waste that can be accepted for disposal. The limit for industrial waste was cut by 3,000 tonnes so that the overall limit of 100,000tpa of waste for disposal at the facility was maintained. The tonnage of household, commercial and industrial wastes can still be altered with the prior agreement of the Agency provided that the total amount of these wastes accepted at the facility does not exceed the combined tonnage of 97,000tpa. However if the licensee does not accept any asbestos waste or less than 3,000 tonnes of asbestos waste in a given year, under the terms of W0178-02 they are still restricted to a limit of only 97,000 tonnes household, commercial and industrial wastes.

In order to retain the annual tonnage at 100,000tpa the licensee has requested an amendment to Schedule A of the Waste Licence W0178-02 to accommodate this (see attached received from licensee on 22/11/2010). The licensee has suggested the insertion of a 'Note 2' in relation to Table A.1 in Schedule A of W0178-02 to allow an annual tonnage of 100,000tpa where the annual tonnage of asbestos waste disposed at the landfill does not reach 3,000 tonnes.

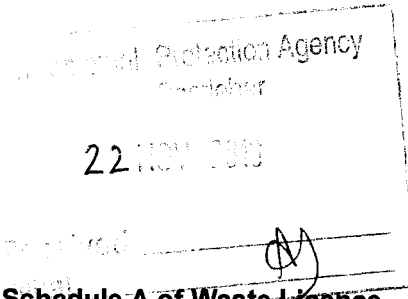
This request cannot be accommodated under the terms of the Waste Licence W0178-02 and I therefore recommend that a Technical Amendment is granted to allow the licensee to retain the annual tonnage of waste for disposal at the landfill as 100,000 tonnes.



18th November 2010.

Mrs Michelle McKim.
Office of Environmental Enforcement,
Environmental Protection Agency,
Regional Inspectorate,
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Castlebar,
Co. Mayo.

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Dear Ms McKim.

RE: Request for Technical Amendment with respect to Schedule A of Waste Licence Register W0178 - 02

Greenstar believes that an anomaly exists in the revised Waste Licence, W0178-02, which limits waste acceptance for disposal at the facility to 97,000 tonnes per annum in the event that asbestos is not accepted at the facility in a given year. The limit for waste acceptance for disposal at the facility under the terms of original Waste Licence, W0178-01, was 100,000 tonnes per annum.

It is Greenstar's understanding that it was not the Agency's intention to impose a reduction on the total amount of waste accepted at the facility to 97,000 tonnes where no asbestos is accepted. With this in mind and in order to retain an annual total tonnage of 100,000 tonnes of waste for disposal at this facility, Greenstar requests a technical amendment to Waste licence W0178-02 with respect to **Schedule A: Waste Acceptance Table A.1.**

The wording of **Schedule A: Waste Acceptance Table A.1** is currently as follows:

Table A.1 Waste Categories and Quantities for Disposal

Waste Type	Maximum (Tonnes Per Annum) ^{Note 1:}
Household	45,000
Commercial	27,500
Industrial Non-Hazardous	24,500
Asbestos Waste	3,000
TOTAL	100,000

Note 1: The tonnage of household waste, commercial waste and industrial non-hazardous waste may be altered with the prior agreement of the Agency provided that the total amount of these wastes accepted at the facility does not exceed the combined tonnage of 97,000 tonnes per annum (as specified in the total above).

Greenstar suggests an amendment to **Schedule A: Waste Acceptance Table A.1**, involving the insertion of 'Note 2' to complement information already present as part of Table A.1 as follows:

Schedule A: Waste Acceptance

Table A.1 Waste Categories and Quantities for Disposal

Waste Type	Maximum (Tonnes Per Annum) ^{Note 1:}
Household	45,000
Commercial	27,500
Industrial Non-Hazardous	24,500
Asbestos Waste	3,000
TOTAL	100,000

Note 1: The tonnage of household waste, commercial waste and industrial non-hazardous waste may be altered with the prior agreement of the Agency provided that the total amount of these wastes accepted at the facility does not exceed the combined tonnage of 97,000 tonnes per annum (as specified in the total above).

Note 2: Where the annual quantity of Asbestos disposed at the facility does not reach 3000 tonnes, the tonnage of household waste, commercial waste and industrial non-hazardous waste may be altered with the prior agreement of the Agency provided that the total amount of wastes accepted at the facility for disposal does not exceed the combined tonnage of 100,000 tonnes per annum (as specified in the total above).

Greenstar would be grateful if this request for technical amendment of Waste Licence Register W0178 -02 could be processed at the Agency's earliest convenience.

If you have any queries regarding this communication please do not hesitate to contact the undersigned at 09096 86014

Yours sincerely

Colin Ryder

Colin Ryder
Greenstar Ltd.
Landfill Operations Manager
Connaught Regional Residual Landfill.