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Environmental Licensing Programme, EPA, PO Box 3000, Johnstown Castle Estate, Co. Wexford

30th July 2010

Waste Licence W0044-02

Re: Request for Technical Amendment Our Reference 44-2/10/EPA/DDMK/01

Dear Sir/Madam.

ENVIRONMENTAL PROTECTION AGENCY

0 4 AUG 2010

I am writing to you to request a technical amendment as per the attached letter (Appendix 1) from Mr Niall Horgan, Office of Environmental Enforcement, for a Specified Engineering works request which we submitted as per the conditions of our license, W0044-02, to the EPA.

In light of the progressive targets in the landfill directive (1993/31/EC) to reduce biodegradable municipal waste going to landfill Thorntons Recycling would like to once again process municipal waste at their facility or the Killeen Road, Dublin 10 rather than just bulk municipal waste and send straight to landfill.

Mechanical Biological Treatment (MBT) processing of municipal waste was previously carried out, from 2003 to 2006 at the facility, with full agreement of the EPA under the conditions of the existing licence W0044-02. Thorntons suspended this operation as it was no longer economically viable due to decline in landfill prices, increasing production costs and the unavailability of a suitable outlet.

The process proposed in our specified engineering works request, (dated the 8th February 2010 Appendix 2), is the same process as previously carried out at the facility with the same infrastructure already in place in Building 3. The process will involve shredding and trommelling the municipal material to remove the oversize, >60mm particle size, for Solid Recover Fuel Production (SRF) and the undersize <60mm, organic fines fraction for stabilising or landfill. The only difference now is that instead of oversize material going to landfill it will be added into our SRF process with some minor adoptions to our infrastructure, this material has been trialled and tested and is suitable for the process, meeting specification criteria.

This process will further reduce waste to landfill and increase the recycling and recovery rates for the facility in line with national and regional waste policy.

As this was previously agreed on a number of occasion with the EPA, we wrote originally to the EPA out of courtesy to inform them of some small works which had to be carried out at the facility on the 8th February 2010 as per conditions of our licence





W0044-02 (Appendix 2). The Office of Environmental Enforcement then sent a request for clarification on the 22nd March 2010 (Appendix 3a) and correspondence was returned on the 9th April 2010 (Appendix 3b).

There are no significant environmental emissions from the SRF process or the processing of municipal waste process. We have been producing SRF at the facility since August 2009 and processed municipal waste previously for three consecutive years from 2004-2006.

The proposed processing activities are included in the current waste licence in Part 1. The licensed activities under the Third schedule of the Waste Management Acts which covers the proposed activities are;

Class 11- Blending or mixture prior to submission to any activity referred to in a proceeding paragraph of this Schedule.

Class 12- Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.

Class 13 – Storage prior to the submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned was produced.

The licensed activities under the Fourth schedule of the Waste Management Acts which covers the proposed activities are:

Class 2 - Recycling or reclamation of organic substances which are not used as solvents (Including composting and other biological transformation processes)

Class 3 – Recycling or reclamation of metals and metal compounds

Class 4 – Recycling or reclamation of other inorganic material

Class 8 - Oil re-fining or other re-uses of oil

I have enclosed copies of agreement from the EPA to Thorntons Recycling in 2004, 2005 and 2006 and request that a technical amendment be carried out on the Licence as per Mr Niall Horgan's letter attached (Appendix 1) to include the necessary amendments to existing classes.

Should the EPA have any queries on the above please do not hesitate to contact the undersigned on 01-6235133.

Yours sincerely,

Mercedes Kavanagh *C* Grou<u>p Environmental Ma</u>nager

Appendix 1



Mr David Duff
Environmental Manager
Padraig Thornton Waste Disposal Limited
Thorntons Recycling Centre
Unit 8 3B
Henry Road, Park West
Dublin 12

REF: Killeen Road

Environmental Protection Agency Regional Inspectorate, McCumiskey House Richview, Clonskeagh Road, Dublin 14, Ireland An Ghniomhaireacht um Chaomhnú Comhshaoi Cigireacht Réigiúnach, Teach Mhic Chumascaigh Dea-Radharc, Bóthar Cluain Sceach Baile Átha Cliath 14, Éire

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15/06/2010

Our Ref: W0044-02/gc8NH

Dear Mr Duff

I refer to your correspondence dated the 8th February 2010, the Agency's request for information dated the 22nd March 2010 and your correspondence dated the 9th April 2010 regarding a proposal to modify the processing of mixed municipal waste and the SRF production line.

I am to inform you that the Agency has considered the information submitted and that this proposal cannot be accommodated under Condition 1.1 of your Waste Licence. A Technical Amendment (Section 42(B) (1) of the Waste Management Acts (WMA)) or a Review of your licence (Section 46(8) of the WMA) will be required to provide for the proposed changes.

To determine if the proposed change can be accommodated by Technical Amendment you should submit the following information to the Agency's Environmental Licensing Programme (ELP), EPA, P.O. Box 3000, Johnstown Castle Estate, Co. Wexford:

- Details of the requested change(s).
- Reasons for the change(s) requested.
- Details of any increase or changes in emissions resulting from the change(s).
- An assessment of the likely impacts of any increase/changes in emissions.
- Please also enclose a copy of this letter for their reference.

If the alteration is considered to be a significant change and cannot be accommodated by a Technical Amendment, the ELP will notify you of the process for applying for a Review.



Please quote the above reference in any future correspondence to the OEE in relation to this matter. If you have any further queries please contact Niall Horgan at 01-2680100.

Yours sincerely

Niall Horgan

Inspector

Office of Environmental Enforcement

Appendix 2



Unit Henry Ri Parkwest Business P Dublir

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Mr. Niall Horgan,
Office of Environmental Enforcement,
EPA,
Mc Cumiskey House,
Richview,
Clonskeagh road,
Dublin 14

8th February 2010

Waste Licence W0044-02

Re: Municipal Waste Pre Treatment and Residuals Management - Modifications to the processing of mixed municipal waste and the SRF production line

Our Reference 44-2/10/EPA/DD/04

Dear Mr. Horgan,

The Government has set progressive targets in the Landfill Directive (1993/31/EC) to reduce the proportion of biodegradable municipal waste going to landfill. By the 16th July 2010, Ireland is restricted to landfilling a maximum of 75% of the total weight of biodegradable municipal waste generated in 1995, the baseline year. This target is further reduced to 50% of the 1995 baseline by 16th July 2013 and 35% by 16th July 2016. Nationally if these targets are not met, financial penalties will be imposed on Ireland.

Thorntons Recycling offers all its commercial customers a brown bin collection service and have rolled out a brown bin for brodegradable waste to more than half its domestic customers in County Kildare and Meath. Killeen road diverted approximately 30,348 tonnes in 2009 of biodegradable waste in the form of cardboard, paper, tetra-pak and wood. In total 44,085 tonnes of biodegradable waste has been diverted from landfill by the Killeen road facility in 2009. We would like to divert more biodegradable waste by processing the mixed municipal waste within building 3, which is currently either baled for landfill or bulked into trailers for landfill.

Padraig Thornton Waste Disposal ltd (PTWDL), T/A Thornton's Recycling are writing to inform the Agency that they propose to segregate the biodegradable fraction of the mixed municipal waste by processing the mixed municipal waste within building 3 at Thornton's Recycling Centre, Killeen Road, Dublin 10, Waste Licence W0044-02. The proposal will result in two separate materials from the municipal waste; oversize material which is typically plastic bags etc which is suitable for Solid Recovered Fuel (SRF) and organic fines/biodegradable waste. The proposal incorporates two stages of development which are explained below;

Stage 1:

Thorntons Recycling proposes installing a conveyor belt along the back wall of building 3. Mixed municipal waste will be loaded onto this conveyor which will feed the waste to







the shredder in the corner of building 3. Once shredded the material will be fed into the 40 foot trommel. The biodegradable fraction will pass through the trommel screens on to a conveyor belt and fall into a bay in front of the trommel within building 3. This material will be loaded using a loading shovel into tipper trucks and consigned for further treatment offsite for stabilisation. The oversize which will consist of predominately large plastic and a paper fraction will be discharged from the end of the trommel, on to a conveyor belt, which will pass under a magnet to remove any ferrous metal, before the conveyor discharges the material into a trailer within building 3. (Drawing: THRMSW021109). This process will be carried out completely within an odour controlled building which is under negative pressure and all trailers will be loaded internally in the controlled environment.

Stage 2:

Stage two involves installing additional equipment onto the existing SRF line, to divert the oversize i.e. plastic and paper fraction of the mixed municipal waste away from landfill. This will be achieved by installing an auger screw and hopper on the beginning of the lower infeed conveyor belt to the SRF shredder (Drawing THR16122009: Rev4). An eddie current will also be installed to remove any non-ferrous metals which are not suitable for SRF production.

The proposal is that once a trailer is filled in building 3 with oversize i.e. paper and plastic from the segregation of the municipal waste, the trailer will be reversed and connected onto the auger screw compartment and tipped into the hopper. The auger will draw the material at a fixed rate onto the conveyor, where it will be mixed with similar material from the ballistic separator of the C.I.D line. The materials will then pass under the eddie current and on to another conveyor where the material will be mixed with similar material from the nihot separator of the C.I.D line before being feed into the shredder. Once the materials are shredded they will be conveyed from the sincider directly to a static hopper and loaded into a trailer to be used as SRF. The building is fully enclosed and odourous material will have been extracted in the processing which will take place in the odour controlled environment of Building 3.

Should the EPA have any queries on the above please do not hesitate to contact the undersigned on 01-603 8444.

Yours sincerely,

David Duff BA (Mod), MA, LCIWM Environmental Manager

Appendix 3



Mr David Duff
Environmental Manager
Padraig Thornton Waste Disposal Limited
Thorntons Recycling Centre
Unit 8 3B
Henry Road,
Park West
Dublin 12

REF: Killeen Road

22/03/2010

Environmental Protection Agency Regional Inspectorate, McCumiskey House Richylew, Clonskeagh Road, Dublin 14, Ireland An Ghniomhaireacht um Chaomhriù Comhishaoil Cigireacht Reigiúnach, Teach Mhic Chumascaigh Dea-Radharc, Bothar Cluain Steach Baile Átha Cliath 14, Éire

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Our Ref: W0044-02/CL01NH

Request for Clarification

Dear Mr Duff

The Agency has reviewed your correspondence dated the 8th February 2010 regarding modifications to the processing of mixed municipal waste and the SRF production line. The Agency considers that the proposal should be regarded as a specified engineering works and shall be undertaken in accordance with Condition 3.2.

The Agency requests that you submit the following additional information so that a complete assessment of the proposal may be completed:

- The licensee shall demonstrate, to the satisfaction of the Agency, how the proposed activities may be undertaken under the existing waste licence.
- Estimated quantities of mixed municipal waste to be processed and quantities of each waste stream generated.
- Hours of operation of the activities proposed.
- Details of storage arrangements for organic fines prior to dispatch off-site. This shall include drawings of the proposed storage area and loading area.
- Detailed procedures for the handling of organic fines. This shall include measures to ensure organic fines are moved off-site in accordance with the conditions of the waste licence.
- An independent evaluation of the proposed additional activities within building 3 and their effect, if any, on the odour abatement equipment.
- An assessment of the potential impact, if any, the proposed activities may have on water emissions from the facility.
- The licensee shall address the requirement to control emissions including, odours and dust from the processing of the oversize material proposed in stage 2.
- The licensee shall demonstrate to the Agency how the activity proposed in stage 2 can be undertaken in compliance with Condition 5.1 of the waste licence.



Upon receipt of the information requested above the Agency will determine if the proposed activities can be considered under the existing waste licence or if consideration would be required either by way of a technical amendment or a review of the existing waste licence.

Please revert to the Agency with this information within 10 working day of the date of this notification. Please quote the above reference in future correspondence in relation to this matter. If you have any queries please contact Niall Horgan at 01-2680100.

Yours sincerely

Inspector

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Appendix 4



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Mr. Niall Horgan,
Office of Environmental Enforcement,
EPA,
Mc Cumiskey House,
Richview,
Clonskeagh road,
Dublin 14

9th April 2010

Waste Licence W0044-02

Re: Request for Clarification- Municipal Waste Pre Treatment and Residuals Management - Modifications to the processing of mixed municipal waste and the SRF production line

Our Reference 44-2/10/EPA/DD/12

Dear Mr. Horgan,

Following on from your letter dated the 22.03.10 requesting clarification regarding the proposed modifications to the processing of mixed municipal waste and the SRF production line at the above facility I would like to submit the following information;

 "The licensee shall demonstrate, to the satisfaction of the Agency, how the proposed activities may be undertaken under the existing waste licence"

The proposed processing activities are included in the current waste licence in Part 1. The licensed activities under the Third schedule of the Waste Management Acts which covers the proposed activities are;

Class 11- Blending or mixture prior to submission to any activity referred to in a proceeding paragraph of this Schedule.

Class 12- Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.

The licensed activities under the Fourth schedule of the Waste Management Acts which covers the proposed activities are:

Class 2- Recycling or reclamation of organic substances which are not used as solvents (Including composting and other biological transformation processes)

Class 4 – Recycling or reclamation of other inorganic materials.

The activity specific to the shredding and processing of mixed municipal waste was carried out previously at the facility with full agreement from the EPA for a tonnage of up to 25,000 tonnes of organic fines. The process of producing organic fines for composting into stabilised bio waste in NWP Ltd, Keady, Co Armagh commenced in 2003 and ceased in September 2006 due the in availability of a suitable outlet This was a very successful operation which increased recycling and recovery rates at the facility. We propose to recommence the same activity in the same location.







The Solid Recovered Fuel (SRF) production process at the facility commenced in August 2009 of which the EPA received full details of same in July 2009. The oversize from shredding of municipal waste will be suitable for blending as SRF, diverting waste from landfill.

(Appendix 1 - Agreements Letters 44-2/ap05br, 44-2/ap06br, 44-2/waro4as, M44-2/war16as).

2. Estimated quantities of mixed municipal waste to be processed and quantities of each waste stream generated"

It is estimated that 80,000 tonnes of MMW will be processed annually to produce SRF and organic fines. This is expected to generate approx 40,000 tonnes of organic fines which will be suitable for composting into a stabilised bio waste and 40,000 tonnes of light residuals such as plastic and papers which are suitable components of SRF.

3. "Hours of operation of the activities proposed"

The facility has a 24 hour license. It is proposed that the operation will take place in day time hours.

4. "Detailed procedures for the Storage of organic fines"

As with the previous operation at the facility in 2004, 2005 and 2006 the organic fines will fall through the trommel onto a conveyor belt beneath, they will be conveyed under a magnet which will remove any metal objects and fall into a holding bay can hold. These fines will be loaded directly into a trailer and removed off site to an approved outlet.

5. "Detailed procedures for handling of organic fines"

Once the organic fines are separated from the MMW the fines will be loaded directly into trailers with the back doors sealed. The trailers will be reversed into Building 3 beside the metal bay and will be loaded within the shed using a loading shovel. Loading will take place within the confines building 3 which is an odour controlled building. Once trailers are loaded with organic fines they will be consigned to another approved facility for further stabilization and processing. The floor areas of the transfer building will be cleared off all waste daily and washed down as normal. Storage bays will be washed and cleaned down on each occasion that such bays are emptied as normal.

6. "An independent evaluation of the proposed additional activities within building 3 and their effect, if any, on the odour abatement equipment"

The odour system was installed at the facility in March 2005. The system was designed to handle the process which was taking place at that time. Independent reports, Odour Monitoring Ireland were submitted to Agency every two months initially and reduced to

every six months as there was no negative impacts from the process, while the process was being carried out at the facility until 2006.

7. Assessment of the potential impact, if any, the proposed activities may have on water emissions from the facility"

It is not proposed to handle material which is not currently accepted on site in compliance with the licence, thus there are not any anticipated impacts on the water emissions. The drainage system within building 3 is connected to a Huber screen to remove suspended solids and then an oil interceptor to remove fats, oil and greases. Material will be removed off site within 24 hours and floors cleaned as normal to prevent any build up of leachate.

8. "The requirement to control emissions including, odours and dust from the processing of the oversize material proposed in stage 2"

Dust generation from the processing of the oversize material is deemed to be negligible and will not require any additional monitoring either environmentally or for health and safety other than those which are already taking place. There is currently a fogging system in place in Building 2 which will be used as required.

It is envisaged that there will be no odour arising from the oversize material which will be mixed into the SRF. Normal daily odour checks will be carried out and preventative actions such as cleaning will be maintained.

9. "How the activity in stage 2 con be undertaken in compliance with Condition 5.1 of the waste licence"

Condition 5.1 states that "All waste processing shall be carried out inside the waste transfer building". All processing of waste will still take place within the buildings as stated in the licence condition.

The separation of organic fines from the oversize material will take place within building 3, an odour controlled building. The oversize material suitable for SRF production will be loaded into a trailer within building 3 and then taken across the yard using a shunter. The trailers will be connected up to a feeder and conveyed immediately to the SRF shredder, thus minimal processing of the material will take place. Once material is shredded, it will be conveyed directly into a closed trailer and loaded for its end destination which is dispatched immediately when full.

Should the EPA have any queries on the above please do not hesitate to contact the undersigned on 01-603 8444.

Yours sincerely,

David Duff BAMMod), MA, LCIWM

Environmental Manager

APPENDIX 1



Ms. Mercedes Feely
Environmental Manager
Padraig Thornton Waste Disposal Limited,
Thorntons Recycling Centre,
Killeen Road,
Dublin 10

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30 January 2004

44-2/AP05br (Production of Fines)

Dear Ms. Feely,

I refer to correspondence from Padraig Thornton Waste Disposal Limited received by the Agency on 30 June 2003 and further clarifications received and our correspondence of 14 November 2003 in relation to the proposal to trommelling mixed municipal waste to produce biodegradable fines. The Agency agrees to this proposal under condition 3.2 of Licence Reg. No. 44-2 subject to the following:

- a) The process may be carried out for a trial period of up to six months. The agreement of the Agency must be obtained to continue the process after the six-month period. Please note that a review of the licence may be required if there is a significant change in the emissions from the facility.
- b) The maximum tonnage that may be processed is limited to the equivalent of producing 10,000 tonnes of the fines per annum.
- c) The process may only take place during daytime hours.
- d) This process must be carried out indoors (Ref. Condition 5.1)
- e) The licensee is not allowed to shred clinical waste (EWC 18-01-04) by this process.
- f) Appropriate controls must be employed to minimise noise, dust and odour emissions from the process and to ensure compliance with Condition 7.1 and the emission limit values specified in the waste licence.
- g) Daily nuisance inspections for noise, dust, vermin, flies and odours are carried out when the trommel and shredder are in operation and records of these inspections are maintained.
- h) No tonal or impulsive component to the noise emissions from process must be detected at the facility boundary.
- i) An analysis of the efficiency of the trommelling process must be conducted within two months of commencement of the process. This should include representative analysis of the inorganic content of the processed fines carried out by an independent

/Bord Na Marack

laboratory. Please note that the results received 24 December 2003 satisfy this requirement.

- j) Additional dust monitoring, to that required in the licence, must be carried out every two months out at the stations detailed in Table D.1.1 of the waste licence for the six months of operation of this process. The Agency must be notified of any exceedances in the dust results in accordance with Condition 1.9 of the licence.
- k) Additional noise monitoring, to that required in the licence, must be carried out at every two months at the stations detailed in Table D.1.1 of the waste licence as well as N1, N2, N3, N4, N5 and N6 for the six months of operation of this process during the time the process is operating. The Agency must be notified of any exceedances in the noise results in accordance with Condition 1.9 of the licence.
- Odour monitoring will be required monthly and this will be covered in separate letter.
- m) Records must be maintained of the quantities of the fines waste recovered and disposed of by the composting facility and these statistics reported as part of the AER.

Yours sincerely

Ms Breege Rooney

Inspector

Environmental Management and Planning



Ms. Mercedes Feely
Environmental Manager
Padraig Thornton Waste Disposal Limited
Thorntons Recycling Centre
Killeen Road
Dublin 10

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Lo Call: 1890 33 55 99

30 January 2004

Our Ref: 44-2/ap/06/br (Natural World Products)

Request for Information: Proposed transfer of waste to Natural World Products

Dear Ms. Feely

I refer to your correspondence received on 9 and the 24 December 2003 in response to the Agency request of 19 November 2003. The proposal to transport fines 10,000 tonnes of fines waste to Natural World Products is satisfactory contingent upon the following records being maintained on-site:

1. Type of waste including EWC Code.

2. Approximate tonnage and frequency of transfer.

- 3. Name of the waste carrier(s) and a copies of the full permit(s) under the Waste Management (Collection Permit) Regulations, 2000 for the transport of waste through the Republic of Ireland.
- 4. Name of the Facility and Reg. No. of the licence to where the waste is transferred to.

5. Copy of the full licence of the facility to which the waste is transferred.

6. Written consent from the operator of the licenced facility to which the waste is transferred to confirming that the facility will accept the waste for recovery specifying the waste types that will be accepted inclusive of weekly and monthly tonnages quotas where possible.

7. Written consent from the licensing authority in Northern Ireland.

8. Copies of the TFS documentation in relation to the transfer of this amber list.

Yours sincerely

Ms Breege Rooney

Office of Environmental Enforcement



Ms. Mercedes Feeley Padraig Thornton Waste Disposal Limited Thorntons Recycling Centre Killeen Road Dublin 10 Environmental Protection Agency Regional Inspectorate, McCumiskey House Richview, Clonskeagh Road, Dublin 14, Ire An Ghníomhaireacht um Chaomhnú Coml Cigireacht Réigiúnach, Teach Mhic Chuma: Dea-Radharc, Bóthar Cluain Sceach Baile Átha Cliath 14, Éire

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2 1 APR 2005

19/03/2005

Our Ref: 44-2/WAR04AS

Dear Ms. Feely,

I refer to your correspondence of the 18th of January 2005 requesting permission to continue the process of trommelling of domestic waste to produce biodegradable fines and the subsequent transport of these fines to NWP Recycling ltd., 55 Cargaclougher Road, Keady, Co. Annagh, Northern Ireland (WDL 10).

The Agency notes that these activities were originally agreed in agency correspondence dated 30/01/2004 (Ref. 44-2/AP05br and 44-2/AP06br).

The Agency agrees to the continuation of the trommelling of domestic waste (EWC 20xxxx) to produce biodegradable fines subject to the following:

- a) The maximum tonnage that may be processed is limited to the equivalent of producing 25,000 tonnes of the fines per annum.
- b) The process may only take place during daytime hours.
- c) This process must be carried out indoors (Ref. Condition 5.1).
- d) The licensee is not allowed to shred clinical waste (EWC 18-01-04) by this process.
- e) Appropriate controls must be employed to minimise noise, dust and odour emissions from the process and to ensure compliance with Condition 7.1 and the emission limit values specified in the waste licence.
- f) Daily nuisance inspections for noise, dust, vermin, flies and odours are carried out when the trommel and shredder are in operation and records of these inspections are maintained.

- g) An analysis of the efficiency of the trommeling process must be conducted on a quarterly basis. This should include representative analysis of the inorganic content of the processed fines carried out by an independent laboratory.
- h) Dust monitoring shall continue as specified in 44-2/AP06br.
- i) This agreement may be revoked by the Agency at any time.

The Agency agrees to the transport of the fines to NWP Recycling ltd., 55 Cargaclougher Road, Keady, Co. Armagh, Northern Ireland subject to the following:

- a) Compliance with all national and European legislation.
- b) The requirements of your Waste Licence (44-2).
- c) The carrier of the waste must have an appropriate and valid waste collection permit.
- d) The Register of Agreed Waste Facilities that be updated to reflect this notice
- e) Copies of relevant waste licences, waste permits and waste collection permits shall be maintained at your facility office.
- f) The above agreement may be revoked at any time by the Agency.

Please use the above reference in any future correspondence on this matter. If you have any further queries, please contact Alan Stephens on 01-2680100.

Yours sincerely

Mr Alan Stephens

Inspector

Office of Environmental Enforcement

· 1.00



Ms. Mercedes Feely
Environmental Manager
Padraig Thornton Waste Disposal Ltd.
Unit 8 3B
Henry Road, Park West
Dublin 12

FAO Ms. Claire Hich, Environmental Scientist

Environmental Protection Agency Regional Inspectorate, McCumiskey House Richview, Clonskeagh Road, Dublin 14, Ireland An Ghniomhaireacht um Chaomhnú Comhshaoil Cigireacht Réigiúnach, Teach Mhíc Chumascaigh Dea-Radharc, Bóthar Cluain Sceach Baile Átha Cliath 14, Éire

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07/04/2006

Our Ref: M44-2/WAR16AS.doc

Dear Ms. Feely

I refer to your correspondence (Ref. 44-2/06/CH/2) received by the Agency on 20/03/2006 requesting permission to send organic times (EWC Code 191212) derived from the shredding and trommeling of domestic mixed municipal waste (EWC Code 200301) to Waddocks Composting Ltd., Killamaster, Co. Carlow.

I am to advise that the above-mentioned proposals as submitted are to the satisfaction of the Agency subject to the following:

- 1. Compliance with all national and European legislation.
- 2. The requirements of licence register no. 44-2.
- 3. The carrier of the waste must have an appropriate and valid waste collection permit.
- 4. The register of facilities agreed by the Agency shall be updated accordingly. Copies of relevant waste licences, waste permits and waste collection permits shall be maintained at your facility office.
- 5. The above agreement may be revoked at any time by the Agency.
- 6. 'A record of all relevant documentation shall be available on site for inspection by authorised persons of the Agency during subsequent inspections and audits.

If you have any queries, please contact Alan Stephens at 01-2680100. Please quote the above reference number in future correspondence in relation to this matter.

Yours sincerely

Alan Stephens

Inspector

Office of Environmental Enforcement