

CARLOW COUNTY COUNCIL

COMHAIRLE CHONTAE CHEATHARLOCHA

County Buildings, Athy Road, Carlow.

Tel: 059 9170300

Fax: 059 9141503

Email: secretar@carlowcoco.ie

Web: www.carlow.ie

9th October 2012



Our Ref: WFP-CW-10-003-01

Mr. Joe Reilly,
Programme Officer,
Office of Climate, Licensing & Resource Use,
EPA,
Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

**RE: Waste Management (Licensing) Regulations
Ref W0284-01 – Application O’Toole Composting Ltd., Ballintrane, Fenagh, Co. Carlow.**

Mr. Reilly,

With reference to yours dated August 1st 2012 the following applies:

Carlow County Council are currently in negotiations with Mr. Pat O’Toole, O’Toole Composting Ltd. regarding the review of waste facility permit WFP-CW-10-003-01. The facility has exceeded tonnages under this permit due to changes in facility operations and in the waste market. Carlow County Council has taken the view that expansion of the facility requires a license from the EPA as a result of the current application being made. In the interim we are reviewing the existing facility permit to clarify waste types and activities on site.

The facility cannot operate as a transfer station and must carry out an element of recovery to material accepted on site. The operations of the state are co-operating fully with the review process and are anxious to remark within permit and license requirements.

With specific reference to the EIS as submitted the following applies:

Section 1.2

Planning permission for the facility should be checked to ensure that all the proposals are covered. The EIS should be referred to Planning for comment.

Section 1.3.1

Surface water run-off will need to be controlled by way of emission limit values in the waste license. More information is required on the well abstraction rates and possible impacts on surrounding wells.

Section 1.4.1

Skip wastes are now controlled by way of a waste facility permit currently under review. This excludes the acceptance of municipal wastes. However Carlow County Council does not have a problem with this under the waste license, provided that the Civic Amenity facility is suitably designed.

Section 2.1.1

The current permit allows for the acceptance of 10,000 tonnes of all wastes per annum. This is at variance with the tonnages contained in the EIS.

Section 2.1.4

Currently the compost maturation area is not under negative pressure, this has led to some odour problems. It will be important that all proposed buildings in the license application are under negative pressure and that biofilters are suitably sized.

Section 2.1.7

The reviewed permit will not allow acceptance of waste from the general public. However Carlow County Council does not have a problem with this under the waste management license, provided that the Civic Amenity facility is suitably designed.

Section 3.1.2

The monitoring location map should contain the location of the surface water discharge point to the receiving stream.

Section 3.2.2.9

Groundwater flow direction should be established in order to review the effect of accidental spillages at the site.

Section 3.4

A summary table should be inserted which will show the worst-case predicted levels at sensitive receptors for Odour, Bio-aerosols, Sulphur Dioxide, Nitrogen Oxides, Particulates, VOC, Carbon Monoxide, Ammonia, Hydrogen Sulphide, Mercaptans. The table should also show the allowable limits for these parameters. The table will take into account predicted levels resulting from biofilters, AD plant and traffic.

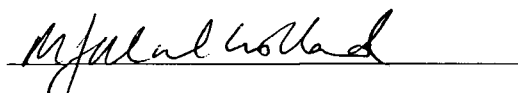
The principal historic non-compliance at the existing facility related to;

- (a) Odour: This arose principally due to the lack of control systems in part of the building. A suitable designed air extraction and treatment system should alleviate this in the expanded facility. Detailed designs should be submitted for these systems.
- (b) Waste Quantities: Waste tonnages have been in excess of those permitted under the existing permit. These tonnages can be facilitated in the expanded facility by suitably designed waste acceptance and treatment facilities.

A copy of the EIS has been forwarded to our planning section for comment.

Carlow County Council are happy to discuss this facility further with you to provide any clarification required by you in processing this application. Please contact the undersigned at mmulholland@carlowcoco.ie with any queries arising.

Yours sincerely,



**M.J.M. Mulholland,
Senior Executive Officer,
Environment & Water Services.**