

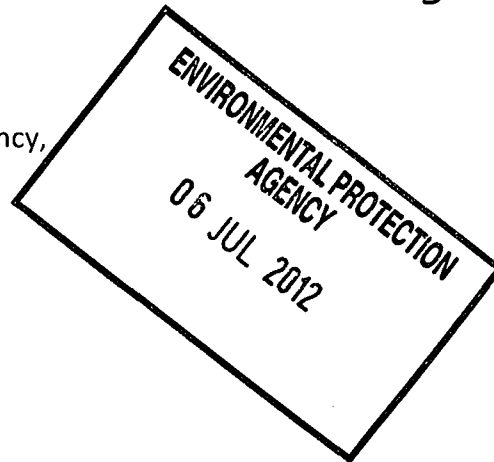


greenstar

setting the standard

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Mr. Brian Meaney,  
Team Leader, OCLR,  
Environmental Protection Agency,  
Headquarters,  
PO Box 3000,  
Johnstown Castle Estate,  
County Wexford



5<sup>th</sup> July 2012

**RE: Request seeking permission to consign baled, wrapped Refuse Derived Fuel (RDF) from Greenstar Recycling (Munster) Limited Licensed Facility, Sarsfieldcourt, Glanmire, County Cork (Licence Reg. No. W0136-02) to Port of Cork**

Dear Mr. Meaney,

With reference to the above waste licence, Greenstar Recycling (Munster) Limited (Greenstar) hereby submits this request to the Agency for their agreement to allow the temporary extension of permitted operational hours so as to permit the loading and transport of refuse derived fuel (RDF) stored on-site. The matter has been discussed in some detail at a recent meeting with our regional Enforcement Inspectors. During these discussions it was agreed that the correct course of action was to make a formal submission to the Office of Climate, Licensing & Resources.

The request is for a temporary relaxation of Condition 1.10, in the context of waste operations only. Even then, the waste operations in question will be restricted to the consignment (loading and transport off-site) of up to 3000 wrapped bales of RDF that will be stored outdoors at our Sarsfieldcourt facility.

Registered in Ireland No 325120

Directors: G. Bailey, C. Bell, J. Dempsey,  
N. Parkinson, C. Bergin (Secretary)  
Registered Office: Burton Court, Burton Hall Road,  
Sandyford, Dublin 18.

Affiliate Organisation, CIWM  
Member of the IWMA  
Corporate Affiliate of the IEI

The temporary nature of the request is two fold;

- Greenstar is only seeking the relaxation on a once per month basis
- Greenstar has a current licence review application (W0136-02, submitted in July 2010) with the Office of Climate, Licensing and Resources. In that application, a more permanent extension to operational hours is sought

### **Background**

I refer to a recent meeting (19<sup>th</sup> June 2012) at the Agency Regional Office in Inniscarra between Agency Inspectors (Caoimhin Nolan and Joe Hunter) and Greenstar (Louise Demir and Malcolm Dowling) during which Greenstar informed the Agency that we intended to produce RFD from the above referenced facility in the near future. Bulk storage of the baled, wrapped material will take place on-site before loading will occur onto ships that will dock at the Port of Cork.

Previous approval for the production and temporary storage of RDF was provided in Agency correspondence dated 22<sup>nd</sup> May 2012 (as per the attached letter). During the course of our recent meeting Greenstar highlighted the critical logistical arrangements that must be in place to ensure that the material is loaded and transported from our facility to the Port of Cork for onward shipment.

In effect, Greenstar is reliant on a 36 hour period during which the ship will be docked in port and capable of taking on board its cargo.

### **Greenstar Request**

Greenstar is authorised to store up to 3,000 bales at the facility. We anticipate that transporting these bales to the docks will involve up to 120 trips using curtain side trailers. As discussed during the meeting, bales will be loaded onto the trucks using bale lamp forklifts with rubber slips used on the forks. Greenstar is currently bound by **hours of operation** in Condition 1.10 of our waste licence that condition waste operational hours to be limited to 7.00am to 8.00pm Monday to Friday inclusive and

7.00am to 3.00pm on Saturdays. Under these restrictive hours of operation it would not be possible for Greenstar to guarantee that the bale loading and transport for shipment could be completed and for this reason we formally apply to the Agency to be allowed a derogation in relation to Condition 1.10, essentially a derogation that will allow a 24 hour operation on approximately a once per month basis. We are not seeking extended hours for processing operations or for additional waste acceptance in this instance.

During this time (24 hour period), Greenstar would operate for a continuous period to ensure that all bales were successfully loaded over the short time window allowed.

Such permission from the Agency could be subject to strict Conditions including reference to the following;

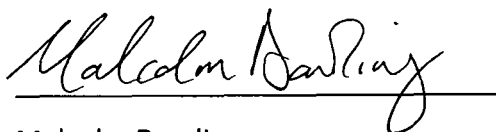
- Greenstar will not accept waste or process any material during the temporary extended hours
- The only operational aspects will be the loading and weighing of vehicles as they leave the site
- On each occasion when Greenstar is shipping the bales, prior notification would be provided to the Agency (7-10 days in advance)
- The agreement is on a temporary basis pending a determination in the licence review application that is currently before the OCLR

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I trust that the details provided in this submission will enable the OCLR to agree to this proposal that will allow dispatch outside of current licensed hours, of baled, wrapped RDF on a once per month basis only.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely,



Malcolm Dowling

Environmental Compliance Manager

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c.c. Mr Joe Hunter, Inspector, Regional Inspectorate, Inniscarra

c.c. Mr Frank Clinton, Programme Manager, OCLR, Wexford