

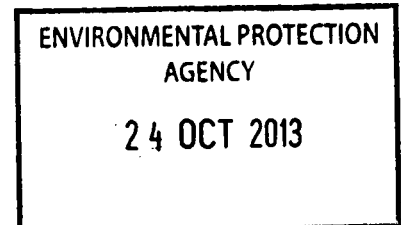


Unit S3B
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23rd October 2013

Waste Licence W0195-02

Re: Proposed Decision for Kilmainhamwood Compost.
Our Reference: W0195-02/13/TMD/01

Dear Ms E. O'Sullivan.

In response to the proposed decision for the review of a waste license for, Kilmainhamwood Compost, Ballynalurgan, Kilmainhamwood, Kells, Co Meath. Thorntons Recycling would like to make the following comments/objections:

1. The correct licensee name is **Padraig Thornton Waste Disposal Limited** and not Padraic Thornton Waste Disposal Limited as detailed:
 - a. On the cover page,
 - b. In the introductory page
 - c. On page 9 under Part 1 Schedule of Activities Licensed, of the proposed decision.
2. The correct address is Unit S3B, Henry Road, Parkwest Business Park, Dublin 12 and not S5B as detailed on page 9 under Part 1 Schedule of Activities Licensed, of the proposed decision.
3. Condition 1.6.1 (iii) of the proposed decision states "*Able to facilitate the achievement of the output quality standards specified in Schedule E; Standards for composting Quality, of this Licence*" Thorntons Recycling would request the addition of the following "*or an alternative quality standard for compost, subject to the agreement of the Agency*" This is to provide consistency with Condition 6.20.1. and Condition 6.20.2
4. Condition 3.22 requests that "*The licensee shall, within three months of the date of grant of this licence, install in a prominent location on the facility a wind sock, or other wind direction indicator, which shall be visible from the public roadway outside the site*". It is not possible to position a wind sock or alternative wind direction indicator on the buildings and have it visible from the public road way which is approximately 800m away. Thorntons Recycling has an automatic weather station which monitors and records the wind direction continuously on site as per Condition 3.23 and that believes that the automated weather station will

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Vat No. IE 45373331



adequately monitor and record wind direction. Thorntons Recycling would request that Condition 3.22 is removed from the license.

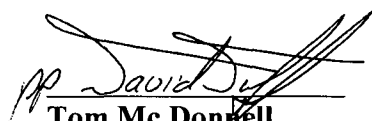
5. Condition 5.3 provides trigger levels for storm water discharges from the facility. Thorntons Recycling believes that, following sampling of the water upstream and downstream (Appendix 1) that the trigger levels set out in the proposed decision are too low. Thorntons Recycling recommends that the trigger levels are set at the quarterly levels recorded upstream as we believe that a discharge from the facility of storm water similar to upstream levels will not cause environmental pollution.
6. Condition 6.13.1 requests that "*Dust curtains shall be maintained on the entry/exit points of the waste processing building*". Thorntons Recycling requests that this part of the condition be removed as the building is under negative air pressure there is a natural inward directional flow of air into the building. The composting process itself creates an internal environment of high humidity and it does not generate dust that would cause environmental emissions. Quarterly reports on dust monitoring carried out at the facility during the original licence (WO195-01) have been submitted to the Agency and demonstrate a compliant track record in relation to dust emissions from the facility. All vehicle entry/exit points are adequately closed off using roller shutter doors and will be kept closed where possible. All pedestrian entry/exit points are adequately closed off using hinged doors and will be kept closed where possible.
7. Condition 8.13 states that "*Unless approved in writing, in advance, by the Agency the licensee is prohibited from mixing a hazardous waste of one category with a hazardous waste of another category or with any other non-hazardous waste*". Thorntons Recycling requests that this condition be removed, as the licensee is not permitted to accept any hazardous wastes as per Schedule A.2 Waste Categories and Quantities for Biological Treatment/Composting.
8. Schedule C.1.2 Monitoring of Emissions to Air requests that odour is monitored quarterly by olfactometric measurement. Thorntons Recycling believes that this is excessive due to the fact that previously reported month analysis (as per conditions in waste licence WO195-01) shows low or no emissions of ammonia, H₂S and mercaptans detected as been released from the biofilters. Thorntons Recycling believes that a quarterly monitoring requirement places a large financial burden on the operator. Thorntons Recycling requests that olfactometric measurement monitoring be carried bi annually with additional monitoring, subject to been requested by the Agency.
9. Schedule E, 1. Stability Table E.1 – Maximum Respiration Activity has set the Stability quality limit at less than or equal to 13 mmolO₂/kg organic solids/hour. Thorntons Recycling requests the addition of the following "*or an alternative stability standard for compost may be used, subject to the agreement of the Agency*" This is to provide consistency with Condition 6.20.1. and Condition 6.20.2. Alternative standards should include at a minimum the UK PAS100

stability standard, the AT4 test, or the Rottegrad stability standard. The Oxygen Uptake Rate (OUR) analysis is a relatively new method of measuring composts stability and not widely used in laboratories to date.

Also included, as per Article 42 a cheque for €500 for making a rejection to the proposed decision.

Should the EPA have any queries on the above please do not hesitate to contact the undersigned on 086-856 3431.

Yours sincerely,


Tom Mc Donnell
Compost Facility Manager

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APPENDIX 1

Consent of copyright owner required for any other use.
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