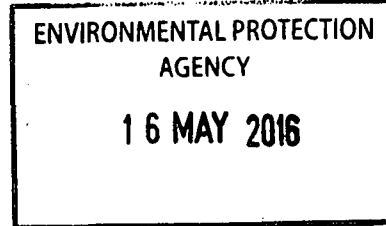


Michelle Reddy
Office of Environmental Sustainability,
EPA,
Johnstown Castle Estate,
Wexford



13th May 2016

Ref: 206-01/16/DD/01

Re: Proposed Technical Amendment to Licence W0206-01

Dear Ms. M. Reddy

In response to the proposed technical amendments to the above licence Thorntons Recycling would like to make the following comments for consideration:

1. Condition x.1.4 proposes placing a limit on the maximum storage or holding period. This is unnecessarily restrictive. Some wastes such as clean rubble which is inert or timber, or fines are not creating a higher risk of fire nor are their recyclability quality been reduced if the period of storage is increased. We would suggest that the condition for a limit on storage periods be limited to putrescible wastes only.
2. Condition x .1.4 proposes that "limitations, as may be necessary, on waste storage arrangements to be used during warm weather to prevent odours arising" Odours can typically not be prevented, but they can be reduced or managed. We would suggest rewording the condition to remove "prevent odours arising" to "reducing nuisance odours"
3. Condition x.1.4 proposes that a "designated fire quarantine area" be incorporated. We would request that a more detailed description of what the EPA considers a fire quarantine area is. Taking into consideration that the facility may be on fire, a building or an individual skip.
4. Condition x 1.5 proposes that the "waste storage practices at the installation shall comply with the waste storage plan at all times". The waste storage plan would be a plan for typical storage conditions at the facility under normal operating conditions. However atypical conditions may exist in the case when there is a crash in recycling markets, a sudden closure of a destination or when the cement kilns are closed. As these conditions are typically unpredictable additional storage of materials may occur at a facility which would not typically be considered in the waste storage plan.
5. Condition x.1.8 proposes that "designated areas for storage of waste shall be visibly or physically delineated by walls, dividers, painted lines or marks on the ground". In cases where waste is stored within a building the storage of waste may be in one corner. Dividing walls may be an obstruction and reduce access in some cases and floor markings would wear off due to the action of a loading shovel scraping on the ground. We would suggest that the delineation and identification of waste storage areas should be acceptable on a map of the facility, where walls, dividers or painted lines are not possible.
6. Condition x.1.1 proposes that "access by vermin is prevented". Vermin, such as rodents cannot typically be prevented from accessing material, however operators can control and mitigate against them by having a pest control plan in place at the facility. We suggest rewording the condition.
7. Condition x.1.1 proposes that the "discharge of leachate or other liquids from the wrapped bales is prevented" Preventing the discharge of liquids from bales may not be possible, if the material has been baled particularly

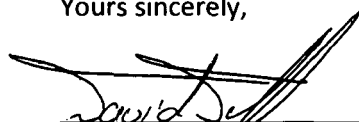
Directors:, Paul Thornton, Shane Thornton , Gary Brady
Registered Office: Unit S3B Henry Road, Parkwest Business Park, Dublin 12
Company Reg. No. 072366 Padraig Thornton Waste Disposal Ltd t/a Thorntons Recycling
VAT No. IE4537333I

wet. However, the facility should control any discharges that may occur from baled material. We suggest rewording the condition.

8. Condition x.1.2 proposes that "bales of waste shall be dispatched from the installation in order of the date of first production". This is not always possible as the first produced bales are usually put to the back of the facility and new bales are stored to the front. When loading out bales, material is typically loaded out from the front. We suggest rewording the condition.
9. Condition x.1.4. proposes that "the integrity of each wrapped bale shall be inspected fortnightly". The integrity of each bale cannot be inspected as the inner bales of a storage stock will not be accessible for inspection, only the outer storage bales will be accessible for inspection. We suggest rewording the condition.
10. Condition x.1 proposes that an "independent and appropriately qualified consultant" carry out the fire risk assessment. Site staff with relevant experience and qualifications in carrying out risk assessments should be allowed to complete the fire risk assessment.
11. Condition x.1 proposes that the fire risk assessment should be carried out within 3 months of the date of this amendment and that the recommendations in the fire risk assessment report be implemented within 6 months of the date of the amendment. We suggest that the recommendations of the fire risk report should be implemented by the licence within 9 months from the date of this amendment. Some waste operators have a number of facilities and implementing actions across a number of sites takes additional time.

Should you have any queries in relation to the above please do not hesitate to contact the undersigned.

Yours sincerely,



David Duff BA (Mod), MA, LCWIM, CEM
Environmental, Health & Safety Manager.

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