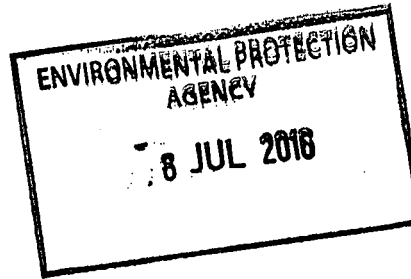




Composting & Organic Waste Recovery  
Mobile Shredding Specialists

Castleblake,  
Rosegreen,  
Cashel,  
Co. Tipperary.

Telephone: 052-6135353  
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Dear Ms Fay

Re: Proposed Technical Amendment to Licence Reg. No. W0270-01

Miltown Composting Systems Ltd. Are licensed to compost Non-Hazardous Biowaste which includes source segregated household kitchen waste and catering wastes; non-hazardous industrial and municipal waste water sludges; and organic fines generated in the treatment of mixed municipal solid waste (MSW)

Unlike Waste transfer stations, Materials Recycling Facilities (MRF) and RDF baling facilities we are a composting facility and as our current **FIRE WATER RISK ASSESSMENT** points out the composting process requires a high moisture content and the Fire Risk throughout the site is Low

The wastes used as feedstock are combustible but in general the composting process requires a high moisture content circa 50-65%. Similarly, the maturing compost is combustible but in general this stage of the composting process also requires a high moisture content typically between 30 and 50%. Any potential fire due to storage would be contained to the core of the windrow material during maturation and would only result from overheating of the material due to the maturation piles not being regularly turned and moved. Because Miltown have a procedure for moving and turning this material on a regular basis the potential for overheating within a windrow core that would result in a fire is considered to be low.

#### **Conclusions**

The risk of fire at the Miltown Composting site is generally low due to control measures implemented by Miltown as part of their process and the types of materials (and the moisture content of that material) stored and processed onsite.

The risk of fire spread is low due to the distances and separation barriers between the buildings and the construction materials of the buildings (i.e., metal frame and cladding).



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As the Fire Risk throughout the site is Low and the materials therein whilst combustible have a moisture content of 30-70%, we feel that all hazards and risks on site can be managed by an **Accident Prevention Procedure (APP)** rather than a Waste Storage Plan. The APP is already a requirement of our license, 'The licensee shall ensure that a documented Accident Prevention Procedure is in place that addresses the hazards on-site, particularly in relation to the prevention of accidents with a possible impact on the environment 'and since as a minimum the Agency requires that 'The APP shall identify all hazards and risks on site and ensure the necessary measures are taken to prevent accidents with a possible adverse impact on the environment and to limit their consequences when accidents do occur', (EPA 2016 Guidance to Licensees on the Preparation of Accident Prevention Procedures and Emergency Response Procedures)

It is thought that the APP will cover any potential issues due to storage and other fire risks

Therefore, Miltown Composting feel that any fire risk and storage planning can be managed through an APP and that there is no necessity for the Proposed Technical Amendment to address fire risk.

Yours Sincerely

Derry Murphy  
Facility Manager

