



**Composting & Organic Waste Recovery  
Mobile Shredding Specialists**

Castleblake,  
Rosegreen,  
Cashel,  
Co. Tipperary.

Telephone: 052-6135353  
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22 October 2018

Reg. No: W0270-02

Dear Sir/Madame

The Agency have requested Milltown Composting Systems (Milltown) to consent to an extension to the appropriate period whereby they must issue a proposed determination on licence application for W0270-02 to February 21, 2019. However, Milltown are very eager to have this process completed in the shortest time period possible to ensure that they remain competitive in the marketplace and meet the increasing pressures in the waste industry for the processing of biowaste material and as such a four month extension would be detrimental for our business.

After being granted Planning permission for increased tonnage intake in 2017, Milltown initially applied for an IED license on the 21<sup>st</sup> of December 2017 and had expected that after over 10 months that the licence application would have been through the licensing process before the end of 2018.

While we understand that our licensing Inspector is now leaving the EPA and has had to hand over this application to the incoming inspector, this is the second change of inspector for the site in the past 12 months and this has increased the delay in processing the licence application through no fault of Milltown. We understand that the Agency have a large workload and require time for the new inspector to review the application but we feel that it is excessive that we are looking at a four-month delay to a proposed determination.

The facility is coming under increased pressure from the marketplace to process increased tonnages of biowaste material due to the limited capacity of landfill and incineration in the country. To react to this pressure Milltown have invested a huge amount of money in preparing the licence application and in upgrading the composting technology on site to accommodate the increased capacity. Based on the works completed by Milltown to prepare to meet the increased pressure from the waste industry it would be detrimental to our business to be looking at a further 4 month delay.



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Milltown feel that the licence application has been in the Agency assessment process for a significant time period (i.e., over 10 months) and as a commercial operation we are not in position to delay the process for a further 4 months as it would seriously negatively impact our business. Therefore, we are not in a position to consent to your request to extend the appropriate period by which the Agency must issue a proposed determination to the 21<sup>st</sup> of February 2019 and are requesting the Agency to proceed to issue the above as soon as is feasibly possible.

Yours sincerely

Derry Murphy

Facility Manager

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